



Lewis Energy Group®

TEAM MEMBER HANDBOOK

WELCOME TO OUR COMPANY GUIDELINES & POLICIES



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THE PURPOSE OF THIS HANDBOOK

This Team Member Handbook contains important information about your employment with LRM. The Benefits Section also describes important insurance information regarding eligibility, coverage, and continuation of coverage.

The Human Resources department has been designated as the champion of our programs and procedures for implementation of company policies. These are evolving policies and are not promises.

All policies and benefits are subject to change and revisions may occur at any time. Pertinent policy changes will be communicated to team members. Revised information may supersede, modify, or eliminate existing policies and benefit programs.

After reviewing the handbook, you will be asked to sign an acknowledgment of the provisions and conditions contained in this handbook. This acknowledgement does not infer or represent a contract or guarantee of employment.

TEXAS EMPLOYMENT-AT-WILL STATEMENT

Team members are reminded that Texas is an "Employment-At-Will" state. Thus, the Company is an "At-Will" employer. That means that the placement of team members on payroll does not constitute a contractual relationship for a specific length of time of employment. That is, either the team member or the employer may sever the relationship at any time without notice, for any legal reason, or for no reason at all. "Employment-At-Will" supersedes all other policies.



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SECTION 1: INTRODUCTION



WELCOME!

On behalf of Lewis Resource Management, LLC ("LRM"), we would like to welcome you as a member of our team! We are happy you are here and are confident you will share pride in our culture as we get to know each other.

Please read this handbook carefully. It is part of our efforts to keep you informed of programs, services and policies that will help you be a successful member of our team.



About LRM

Lewis Petro Properties, Inc., founded in 1983 is a vertically integrated natural gas company involved in exploration and production, gas gathering, well services and well operations. Lewis Petro Properties, Inc. and LRM are wholly owned subsidiaries of Lewis Energy Group, L.P., which is owned and controlled by the Rod Lewis family. LRM and its affiliates may be referred to as the "Company" in the handbook. Rod Lewis is our Founder and CEO. The Company's management has extensive industry experience and a strong track record of producing value by managing risk associated with Company operations.

Mission Statement

We will capitalize on current assets and capabilities across our organization to successfully investigate and explore areas of opportunity in our domestic and international oil and gas plays.

We will regularly and consistently engage all opportunities to expand and enlarge our successful and time-tested vertical integration model.

We will promote a culture of exceptional performance by insisting on:

- Safety
- Fiscal responsibility
- Teamwork
- Continuous learning and development
- Respect for the communities in which we operate
- Environmental stewardship

SECTION 2: WHAT'S IMPORTANT

Equal Employment Opportunity

The Company is an Equal Employment Opportunity employer. All decisions are based on merit, qualifications, abilities, and performance without regard to race, color, sex, religion, age, national origin, disability, marital status, or other characteristics protected by local, state or federal law. Anyone found to be engaging in unlawful discrimination or harassment will be subject to disciplinary action, up to and including termination of employment. Please see the policy regarding harassment in this policy manual.

Open Door Policy

The Company recognizes that, from time to time, team members have questions or concerns that they would like addressed by the Company. For this reason, we invite you to direct any questions or concerns regarding the Company, its policies and procedures and your employment with the Company to your supervisor. If your question or concern is not resolved to your satisfaction after speaking to your supervisor, you should request an appointment with the next level in your chain of command, or Human Resources. While the Company cannot guarantee that team member concerns will be resolved to the team member's satisfaction, the Company will strive to respond to your question or concern and, to the extent possible, explain its response to you.

Arbitration

As a condition of employment with LRM, you have executed an Arbitration Agreement between you and the Company requiring you to submit all legal claims, save certain exceptions to arbitration in accordance with the American Arbitration Association. Please consult the [Team Member Arbitration Agreement](#) and [procedures](#).

SECTION 3: GETTING STARTED

WORKING AT THE COMPANY

Pre-Employment

Before being employed for regular full-time, part-time or temporary positions, applicants must successfully pass a criminal background check, motor vehicle record check, and a drug test or physical, depending on position, administered by a company-designated physician. A credit check will be performed for applicable positions.

Exempt and Non-Exempt Categories

Non-Exempt (hourly) team members receive pay for overtime work. These team members report and track hours via company payroll system. No other person than the team member may report time or clock-in or out, under any circumstances, unless approved by the department head.

Exempt (salaried) team members are not required to track their time. However, they are required to report missed time by submitting a Paid Time Off (PTO) request through the company payroll system to their supervisor for any missed time of four or more hours. If no PTO days are available, requests for advanced PTO must be made in writing by the department head. Please see the leave policy regarding extended absences.

Work Schedules and Working Hours

Work hours and schedules vary depending on the duties, department, and location in which the team member works. A team member should check with their manager to learn the department's hours of operations, as well as their own work schedule.

The basic workday for a regular, full-time team member is eight hours with a one-hour lunch. This is equivalent to a forty-hour work week. Normal operating hours for support and administrative offices are 8:00 AM until 5:00 PM Monday through Friday. Customer/employee services are expected to be fully available by both exempt and non-exempt team members during these hours. Any deviation from this normal schedule must be approved by the Department Head and Human Resources.

Working "off the clock" by non-exempt hourly team members is never permitted. Likewise, refusal to work beyond the team member's regularly scheduled hours when requested may also result in disciplinary action up to and including termination. Overtime will be paid to non-exempt team members according to state and federal laws.

Work Week

For pay and overtime purposes, the work week commences at 12:00 AM on Monday and ends at 11:59PM on Sunday for all areas, except for Production and Drilling.

Overtime

When work cannot be completed during your regular work schedule, team members may be scheduled to work overtime. A non-exempt team member shall be paid one-and-a-half times his or her regular rate of pay for hours worked over forty each work week and in accordance with state and federal regulations. Your manager must authorize all overtime work in advance.

Work Assignments

The employer reserves the right to assign team members to jobs other than their usual assignments when required. Team members may be required to work overtime or hours other than normally scheduled, when necessary.

Attendance and Punctuality

Because reliability is essential for handling job responsibilities and providing good customer service, good attendance and punctuality are essential. Regular attendance and punctuality are expected of all team members. If you are unable to report or will be late, notify your supervisor prior to the start of your shift or workday.

Emergency and Emergency Closures

Emergencies such as severe weather, fires, power failures, or other acts of God can disrupt LRM operations. The primary concern during any emergency is the safety and well-being of our team members, customers, and visitors.

If an emergency occurs during working hours or during non-working hours, and you are unsure of whether you should report to work, contact your manager, or alternate emergency contact person. The Emergency Operations Center (EOC) 24/7 Telephone number is (210) 384-5000.

Job Abandonment

Job Abandonment is when you fail to report to work and do not notify your supervisor for three consecutive days. If this occurs, you will be considered to have voluntarily quit.

No Call/No Show

No Call/No Show is considered an Involuntary termination, which is when you do not call in to provide notice of your absence and then try to come back to work on your next scheduled workday.

Confidentiality and Proprietary Information

While you are employed with the Company, you may have access to information about our customers, operations, future-plans, providers, or other team members all of which is confidential and not for disclosure to non-LRM team members, including family members or acquaintances. You must be diligent to the sensitivity of this information and protect against its unauthorized or inappropriate disclosure, both on and off the job, during and after employment.

Ask your manager if you have any questions about information security requirements and how they apply to your job. Violations of this policy are serious and can result in disciplinary action, up to and including termination of employment.

Dress and Appearance

The Company believes, in most cases, that a team member's personal appearance is his or her own concern, however, the image presented to customers, business partners, and other members of the community, is a direct reflection of the Company. Office team members are asked to maintain a clean and neat appearance, use good judgment and exercise discretion regarding appearance and dress. Avoid apparel that is disruptive to the workplace being too revealing, offensive or unsuitable for a work environment. Field team members are required to wear uniforms (see Uniforms guidelines under Section 5). Team members should consult with their manager if they have questions about the dress code.

Workspace or Office Appearance

A workspace policy outlines the rules and guidelines for how team members should behave and utilize the workplace, ensuring a productive and respectful environment. Any picture or item hung directly on the walls of the building must be approved in advance if it requires drilling into the office or cubicle walls. Posters, pictures, notes, etc., are permitted as long as they are appropriate for workplace display and are not offensive to other team members. Lewis Energy Group consistently enforces its policies prohibiting workplace discrimination and harassment of any kind, including images, graphics, or other visual displays, that may constitute offensive or inappropriate workplace conduct. Team members should not leave sensitive or confidential information lying on their desk top or anywhere it can be easily accessed by unauthorized persons. It is best to keep it in a locked drawer or file cabinet when the documents are not being used or disposed of in a secure container to be shredded. Team members in violation of this policy will be subject to appropriate disciplinary procedures, up to and including termination of employment, for repeated or egregious violations.

Security-Badges and Surveillance

To protect Company property and for team member safety, all team members must wear a company- issued photo identification badge. The badge must be worn so that it is visible at all times.

The Company also reserves the right to conduct surveillance via video and audio equipment in certain locations in the facilities. Team members have no reasonable expectation of privacy regarding movement or activity within the Company facilities or regarding electronic communications sent via Company equipment.

SECTION 4: GETTING PAID

PAY-CHECK

Exempt and Non-Exempt

All team members are paid bi-weekly, every other Friday. If a payday falls on a holiday, checks will be issued on the Thursday before the holiday.

All non-exempt team members should use the company payroll system to track their hours worked. Through the company payroll system, their hours are routed to the supervisor and then to Payroll for review. Clocking-in/out for other team members is strictly prohibited and will be grounds for disciplinary action up to and including termination of employment.

Exempt team members are not required to turn in time worked. However, they are required to submit all absences and any missed time beyond four hours via the company payroll system.

Discrepancies

All non-exempt team members are responsible for clocking-in/out to accurately record all time worked. If you notice any errors, discrepancies, or issues with your paycheck, (i.e. incorrect rate of pay, or number of hours paid) then you must immediately contact your supervisor and/or Payroll to report this matter. Team members are accountable for their own time. Team members that falsify time records and/or report compensable hours not actually worked, will be subject to disciplinary action up to and including termination of employment.

Advances

The Company does not provide payroll advances or extend credit to team members.

Tax Withholding and Other Payroll Deductions

The law requires the Company to make certain deductions from every team member's compensation. Among these are applicable Federal Income Taxes, State Taxes, if applicable, Medicare, and Social Security Taxes. Deductions for team members portions of group insurance premiums will be made based on the individual insurance elections. The Company will also deduct federal tax delinquencies, child support payments and student loan payments if mandated by a court order or statute. No deductions, however, will be made to directly pay a team member's creditors.

Any deductions made by the Company and the amount of those deductions will be listed on the pay stub. These deductions will also be totaled at the end of each year and reflected on the IRS Form W -2, Wage and Tax Statement, provided to team members for income tax purposes.

It is the Company's policy to comply with all requirements of the Fair Labor Standards Act. For team members classified as exempt under the FLSA, the Company will pay them their weekly salary for every week in which they perform work. However, if necessary, the Company may make the following deductions from an exempt team member's salary:

- When an exempt team member is absent beyond 4 hours for personal reasons.
- To offset amounts a team member receives as jury or witness fees or for military pay.
- For penalties imposed in good faith for infractions of safety rules of major significance.
- For unpaid disciplinary suspensions of one or more full days imposed in good faith for workplace conduct rule infractions, including those listed in this Policy Manual.
- To adjust a team member's weekly salary for his or her initial or last week of employment.
- For weeks in which a team member takes unpaid leave under the Family and Medical Leave Act.

If at any time you believe that an improper deduction has been made, immediately report the improper deduction to Payroll. All reports of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, the Company will promptly reimburse you for the improper deduction and make a good faith effort to avoid any improper deduction in the future. The Company also will not tolerate any retaliation against team members who in good faith report alleged improper deductions in compliance with this policy.

Direct Deposit of Your Pay

Team members are required to have direct deposit for payroll. With direct deposit, you have the convenience of having the funds available to you on payday, whether you are in the office, away, or in a remote location where mail delays may occur. You may have your check deposited into a checking and/or savings account with any financial institution. Live checks will be mailed or electronically deposited during these times, only if the team member is on FMLA, is on an extended PTO absence, or is terminated and receiving a final check or severance payment.

These exceptions require the approval of the Payroll and Human Resources.

If you wish to have your paycheck distributed to a third party, you must prepare a signed written statement for delivery to Human Resources or to the supervisor authorizing release to the third party.

On-Call Policy

Team members in certain positions may be listed as “on call” which requires the team member to respond to calls at any hour. These positions will be approved by management and Human Resources, based on the needs of the department. The following conditions apply to this requirement:

- The expected hours the team member will be “on call” will be designated by the department manager/supervisor. In general, unless otherwise specified, a team member will be “on call” starting on Monday and run continuously through the week to Sunday, including holidays.
- If a team member receives a notification to report by phone or text, they are required to respond by phone or text within 20 minutes to the person providing notice.
- A team member must physically report to work within two hours of notification or sooner should conditions warrant a quicker response.
- Hourly team members will be paid any actual time worked while “on call”.

Please refer to the drug and alcohol provisions in the handbook as well as all other provisions that apply when reporting for duty in response to a call.

Failure to report as specified by this policy can result in disciplinary action, up to and including termination of employment.

LEAVING THE COMPANY

Resignation

If the team member plans to resign, they should notify their manager and provide a letter of resignation. We ask for a two-week notice, if a two-week notice cannot be provided, PTO will not be paid out. This helps to ensure that their manager has enough time to find a replacement for them. PTO cannot be taken during the two-week notice period.

When a team member voluntarily resigns, that action is called “voluntary resignation”. We also consider that if the team member does not call or report to work for three consecutive days during their work schedule, they have voluntarily resigned their employment with the Company.

Generally, on or near the team member's last day, they will have an exit interview with the Human Resources. At that time, the team member should also return any keys, equipment, vehicles, ID badge, uniforms, or other items provided for the team member's use to avoid payroll deductions for company property. The Company may deduct wages from the team member's paycheck for the replacement value of any company property that is destroyed or rendered inoperable as a result the team member's negligence. The Company may deduct wages from the team member's paycheck for the replacement value of any company property the team member fails to return to the Company upon separation or upon the request of company management.

SECTION 5: COMPANY STANDARDS

MISCONDUCT

In cases in which a team member's actions seriously disrupt operations or involve serious violations of policies or standards, employment may be terminated immediately. Examples of such behavior or conduct include, but are not limited to the following:

- If it is discovered at any time that a team member has failed to completely and honestly provide any information requested of them for official company purposes, the team member understands that they may be subject to disciplinary action, up to and including termination of employment.
- Being convicted of, or pleading guilty or nolo contender to a crime of dishonesty, theft, violence, or breach of trust.
- Theft of or damage to company property.
- Use, possession, sale or distribution of illegal drugs.
- Being under the influence of alcohol or illegal drugs while on company property or performing company duties.
- Sleeping on the job.
- Challenging authority, verbal or physical outburst and other inappropriate behavior.
- Excessive use of personal activities during company time.
- Harassment or intimidation of others.
- Possessing or bringing firearms, weapons, or similar items on company property or in a company vehicle.
- Fighting or provoking violent behavior while on company property or performing company duties.
- Not cooperating in an investigation conducted by the Company or its agents.
- Openly discussing an investigation.
- Unauthorized release of confidential or propriety information, to include disclosure, discussions or insinuations, regarding the employee's own or other employee's salary information with unauthorized personnel is strictly prohibited.
- Insubordination or refusal to perform tasks as assigned.
- Violations of company policies or procedures related to financial transactions, conflicts of interest or other activities.
- Any disparagement of the company, including but not limited to, Rodney Lewis and his family.
- Unsatisfactory job performance and carelessness or negligence when performing duties.
- Loaning or duplication of any company property to include company keys, badge, etc.

All team members are required to notify Human Resources within five days of his/her notice of any arrest, charge, conviction or investigation for the violation of any misdemeanor or felony related criminal offense. Failure to notify Human Resources could result in disciplinary action up to and including termination of employment.

Misconduct, violations of company policies, and any other behaviors that may reflect poorly on the professional image of the Company may result in a Performance Improvement Notice (PIN). There are three levels of PIN: written, final written and termination. Depending on the circumstances of the situation, a PIN may be elevated directly to Final Written or Termination of employment when necessary.

DOT Disciplinary Process

Team members holding DOT positions within the Company are also subject to the DOT disciplinary process, which delivers points per violation. A team member's accumulated points over a 12-month period will trigger a verbal, written or final disciplinary action based on the corresponding DOT violation. To learn the specific DOT violations and corresponding points per offense refer to the LRM DOT Disciplinary Matrix for more details. The threshold for accumulated points in a 12-month period is outlined below.

POINT SYSTEM THRESHOLD AND CONSEQUENCES		
Total Accumulated Points (12-month Period)	Disciplinary Action	Days Off/Training/Demotion
Over 4 points	Written Warning	2 days standard + 1 day per OOS violation
Over 8 points	Final Warning	Demotion/Re-train LRM Trucking program
Over 12 points	Termination	Separation

Please also reference the [Vehicle Safety Standards SOP 4.7- DOT Compliance for Company-Owned CMVs.](#)

WEAPONS

The Company strictly prohibits the possession and carrying of firearms, whether concealed or not, on Company premises and in Company vehicles.

PURSUANT TO SECTION 30.06, PENAL CODE (TRESPASS BY HOLDER OF LICENSE TO CARRY A CONCEALED HANDGUN), A PERSON LICENSED UNDER SUBCHAPTER H, CHAPTER 411, GOVERNMENT CODE (HANDGUN LICENSING LAW), MAY NOT ENTER ANY PROPERTY OPERATED BY THE COMPANY WITH A CONCEALED HANDGUN.

DE ACUERDO CON LA SECCIÓN 30.06 DEL CÓDIGO PENAL (INGRESAR CON LICENCIA PARA PORTAR ARMAS), UNA PERSONA CON LICENCIA BAJO EL SUBCAPÍTULO H, CAPÍTULO 411 DEL CÓDIGO GUBERNAMENTAL (LEY DE LICENCIAS DE ARMAS), NO PUEDE INGRESAR PORTANDO UN ARMA A PROPIEDAD ALGUNA OPERADA POR LA COMPAÑÍA.

PURSUANT TO SECTION 30.07, PENAL CODE (TRESPASS BY LICENSE HOLDER WITH AN OPENLY CARRIED HANDGUN), A PERSON LICENSED UNDER SUBCHAPTER H, CHAPTER 411, GOVERNMENT CODE (HANDGUN LICENSING LAW), MAY NOT ENTER THIS PROPERTY WITH A HANDGUN THAT IS CARRIED OPENLY.

DE ACUERDO CON LA SECCIÓN 30.07 DEL CÓDIGO PENAL (INGRESAR CON LICENCIA PARA PORTAR UN ARMA EXPUESTA), UNA PERSONA CON LICENCIA BAJO EL SUBCAPÍTULO H, CAPÍTULO 411 DEL CÓDIGO GUBERNAMENTAL (LEY DE LICENCIAS DE ARMAS), NO PUEDE ENTRAR PORTANDO UN ARMA EXPUESTA.

CONFLICTS OF INTEREST

Fair and impartial business dealing with parties outside of the Company shall be maintained. Team members will remain free of any internal or external conflicts of interest in which the team member is or becomes involved (family or personal relationships, friendships, etc.). Team members shall disclose any real or perceived conflicts of interest at all times.

Please also refer to the Kick Back and Gift Policy for further details.

UNIFORMS

All field team members are required to wear the appropriate clothing for the job. Always remember that while wearing a Company uniform, you are representing Lewis Energy Group and anything you do reflects on the Company. Flame resistant clothing (FRC) is part of our PPE and acts as a protective barrier that could help prevent injuries during day-to-day operations. Taking proper care of FRC Clothing, and Arc Flash Clothing is crucial in protecting our team members from injuries in the workplace. For that reason, it is critical to ensure that FRC garments are laundered such that contaminants (e.g. dirt, oils, etc.) will not affect the performance of the garment when in use, as well as, identifying when they are not acceptable for duty. Please refer to your Safety Representative or Manager for further clarification.

SECTION 6: COMPANY PROPERTY

Company Vehicles

Company may provide vehicles to some Team Members for use in connection with the business. Company pays for insurance, license fees, repair and maintenance, fuel cost. All Team Members who are assigned to operate a vehicle owned, leased or rented on behalf of Company are reminded that certain rules and regulations are expected to be followed and that all usage of Company vehicles is subject to the Lewis Energy Group Vehicle Safety Standard. Please reference the [Vehicle Safety Standards](#) for further details, specifically sections 4.5, 4.5.1, and 4.6.

Below are examples of expectations for Team Members operating Company vehicles:

- Team Members must follow all local, federal, and state guidelines, report unsafe conditions, and follow all posted requirements.
- Team Members must report any accidents and/or damages to their supervisor immediately.
- Team Members are responsible for reporting any vehicle malfunctions immediately.
- Company vehicles are for Company business use only. All passengers must be related to Company business.
- The use of a Company vehicle for personal or recreational use is not permitted.
- Transporting, possessing or using alcoholic beverages or illegal/unauthorized drugs or drug paraphernalia while operating a Company vehicle is prohibited.
- Speeding or reckless driving while operating a company vehicle including lease roads is prohibited.
- Taking a Company vehicle across the U.S. Border into Mexico is prohibited unless authorized by the supervisor.
- Team Members are strictly prohibited from picking up any hitchhikers or any other non-employee passenger.
- Smoking, including electronic cigarettes and vaping, inside Company vehicles is prohibited.
- All Team Members must adhere to all regulatory and statutory laws regarding the operation of a motor vehicle.
- Having a weapon or gun in a Company vehicle is not permitted.
- Team Members are responsible for ensuring Company vehicles are clean and adhere to proper maintenance schedule with the Service Center. This also includes ensuring accurate entry of mileage when fueling at the station or using any fueling cards.
- Team Members are only permitted to utilize hands-free devices while driving (please refer to the policy on mobile phones and hand-held electronic devices set forth in this Handbook and in the Lewis Energy Group Vehicle Safety Standard).

Company Provided Vehicles-Team Members

Team members in possession of Company vehicles will be classified in one of two categories for the purposes of complying with I.R.C. 274 and the applicable regulations: No Personal Use (Including Commuting) Policy or No Personal Use Except Commuting Policy.

No Personal Use (Including Commuting) Policy

- Vehicles owned or leased by Company are provided to one or more Team Members are for use in connection with business purposes only.
- When Company vehicles are not being used for such business purposes, they are to be kept on Company premises (or temporarily located elsewhere, e.g., for repairs).
- No Team Member using the vehicles lives at Company owned premises.
- No Team Member (or any individual whose use of the vehicles would result in gross income to the team member) may use Company vehicles for any personal purposes, other than de minimis personal use (such as a stop for lunch between two business deliveries).
- Except for de minimis use, no Team Member or other individual whose use of such vehicle would result in taxable income to the Team Member uses the vehicle assigned to such Team member for any personal purpose.

No Personal Use Except Commuting Policy

- Vehicles owned or leased by company provided to one or more Team Members are for use in connection with business purposes only, except for commuting or de minimis personal use.
- Company understands that, for bona fide non-compensatory business reasons, certain Team Members are required because of their specific position with the Company to commute to and/or from work in Company provided vehicles.
- Team Members may not use any Company provided vehicle for any personal purposes, other than commuting or de minimis personal use (such as a stop for a personal errand between a business delivery and the Team Member's home).
- Except for de minimis use, neither the Team Member, nor any individual whose use would be taxable to the Team Member, shall use the vehicle for any personal purpose other than commuting.
- Company will account for the commuting use of Team Members by including in the Team Member's gross income the commuting values (\$1.50 per one way commute for each employee) as provided in Treas. Reg. 1.61-21. Commuting valuation rule is not available for "Control Employee." Please see Company Provided Vehicles – Control Employees section herein for alternative valuation method.

Company Provided Vehicles – Control Employees

- Any Team Member defined as "control employee" for purposes of the applicable provisions in Treas. Reg. 1.61-21 and IRS Publication 15-B are prohibited from using Company provided vehicles under the No Personal Use Except Commuting Use Policy set forth hereinabove and instead the Company will comply with relevant IRS regulations and Annual Lease Value method pertaining to "control employees".
- The Annual Lease Value will be determined using the vehicle's Fair Market Value from the National Automobile Dealers Association (NADA) website and Table 3-1, IRS Publication 15-B (2025). For example, the Fair Market Value of a 2023 F-150 with 42,880 miles is \$37,000. According to Table 3-1, Publication 15-B (2025), the Annual Lease Value for the use of that vehicle is \$9,750. At year end, the employer will value the commuting use of the vehicle by control employee by multiplying the Annual Lease Value by percentage of personal use which will result in employee's gross wages, subject to withholding.

Searches of Company Property, Premises, and Computer Systems

Company offices, furnishings, office equipment, computer, email systems, and vehicles are Company property and are intended for Company business. Accordingly, there should be no expectation of privacy anywhere within the confines of the Company's premises, property, systems or Company vehicles. These properties, premises, systems, and vehicles are subject to search at any time without prior notice.

By way of example only, and not of limitation, no Team Member should have any expectation of privacy to anything stored in any of the furniture (i.e. desks, credenzas, etc.) within the Company's offices or facilities, on the Company computers and email systems, within Company vehicles, or within the confines of the offices or facilities (irrespective of whether the furniture assigned to any employee is under lock and key or not). Similarly, Team Members should not expect privacy with respect to information stored in the hard drives of computers, servers, computer network or on any individual computer within any of the offices or facilities. Nor may any Team Member place any passwords or obstacles to retrieving information stored on the hard drives of any Company computers without the express authorization of their manager.

Any materials intended to be kept personal and confidential should not be left on or in Company premises. Likewise, do not use the Company email system for personal matters that you do not wish management to read.

Any questions regarding the meaning or application of this policy should be directed to your supervisor or HR Department.

Monitoring of Workplace and Company Telephone Systems

The Company hereby gives notice that, for security purposes, and to guard against the unauthorized disclosure of confidential Company information, it may conduct video and audio surveillance of any non-private area of the workplace. In other words, all areas other than restrooms, sleeping quarters, and ADA compliant private rooms are subject to surveillance. By continuing to work for the Company, you are deemed to have consented to this surveillance.

In-Vehicle Monitoring Systems (IVMS)

Company hereby gives notice that Company vehicles are equipped with IVMS and that Company may conduct video and audio monitoring of all Company vehicles, by means including but not limited to dash cams or other monitoring devices. By continuing to work for the Company, you are deemed to have consented to such monitoring as well. In the event any Team Member is involved in any accident/incident or in the subject of any IVMS triggered safety alerts, the Company hereby gives notice that if any IVMS were in operation at the time of the incident or safety alert, any and all such footage may be used for internal incident review and/or for training purposes.

SECTION 7: LEAVES OF ABSENCE

PAID TIME OFF

Team members with standard PTO will receive the following PTO allotment based on the years of service. All PTO is granted and not earned by our team members.

Years of Service	Additional PTO Hours
1 Year	128
5 Years	160
10 Years	192
15 Years	200
20 Years	216

Eligibility

Regular full-time team members who have successfully completed a three-month waiting period are eligible for Paid Time Off. Team members may use PTO for any reason including excused sick days and vacation.

New Hires

New hires DO NOT have PTO their first three months of work. When they reach three months of work they are granted their prorated days for the rest of that year. New hires that have not completed their three-month waiting period on January 1st will have their PTO prorated when they meet their three month eligibility point. The prorated schedule is as follows for new hires in a non-rotating shift:

Hire Month	When PTO is Available	Prorated PTO Hours
January	April	104
February	May	96
March	June	88
April	July	80
May	August	72
June	September	64
July	October	56
August	November	48
September	December	40
October	January	128
November	February	120
December	March	112

Anniversaries

Team members working a non-rotation shift are granted additional PTO when they reach the 5, 10, 15, and 20 year anniversary of their employment. The amount of PTO awarded depends on the month during which the anniversary falls:

5 and 10 Year Anniversary	
Hire Month	Additional PTO Hours
January or February	32
March or April	24
May or June	24
July or August	16
September or October	16
November or December	8

15 Year Anniversary	
Hire Month	Additional PTO Hours
January or February	8
March or April	8
May or June	8
July or August	4
September or October	4
November or December	4

20 Year Anniversary	
Hire Month	Additional PTO Hours
January or February	16
March or April	16
May or June	16
July or August	8
September or October	8
November or December	8

Compensatory Time Guidelines

These guidelines provide managers with the authority to grant exempt team members who work more hours than regularly scheduled to receive compensatory (comp) time off on a pro-rata basis.

The provisions of the Fair Labor Standards Act (FLSA) established a test to determine overtime exemption applied to all positions within Lewis Energy Group. Positions that do not meet the exempt test standard are classified as non-exempt. Non-exempt positions are entitled to overtime pay and must be compensated for any hours worked over 40 hours in a work-week and are not eligible to earn comp time.

Granting Comp Time

Managers may be able to grant comp time to exempt positions based on operational demands. There is no legal requirement or obligation of Lewis Energy Group to grant comp time to exempt team members. A manager may choose to grant comp time to exempt team members who are required to work more than their scheduled work week due to special projects or operational demands that require them to work on times that they are normally scheduled off.

Rotating Shifts

Team members working a designated rotating shift will be granted prorated PTO after three months of service based on their PTO allotment. These hours may only be used for illness absences that occur during their “on-period” of service or at the discretion of your department manager. The PTO allotment applies only for the following rotating shifts with less than five years of service: (All other shifts will follow the normal PTO allotment described above).

Shift Type	PTO Hours
7/7 4/4 14/14	56
6/3 8/4 10/5 14/7 8/4 & 7/2 8/6	72

Team members on a rotating shift with five years and ten years of service will be granted the following PTO allotment:

Shift Type	Five Years	Ten Years
7/7	72	88
4/4	72	88
6/3	96	120
10/5	96	120
8/4	96	120
14/7	96	120
8/4 & 7/2	96	120
8/6	96	120

Team members who were previously contractors must wait for their three months of service to be granted PTO. PTO is a company benefit and an incentive that is awarded when becoming a team member. Therefore, everyone must abide by this policy without expecting to start work with any seniority privileges.

The team member's supervisor or manager is responsible for making sure that the team member has met the three-month waiting period requirement and has enough PTO available before approving PTO requests. Managers are not authorized to overwrite the company policy.

Unused PTO cannot be carried over from year-to-year. This means that PTO must be used during that calendar year. If the team member's PTO is cancelled due to business operations, the team member must make arrangements with the supervisor within a reasonable time frame (before the end of the calendar year) to take the PTO hours. Supervisors should ensure all team members have the opportunity to schedule authorized PTO.

Any unused PTO will be forfeited when a team member separates from the company unless the team member provides to Human Resources a written, two-week notice. Holidays that fall during this notice will not be deducted from the 14 days. PTO may also be paid out upon departure when a position is eliminated due to business necessity. A maximum of 40 hours of PTO is paid out upon separation.

Team members will not be paid any unused PTO if their employment is terminated due to disciplinary action, for breaking company policy or safety policy violation.

Team members are not authorized to take PTO after turning in a resignation. Rehires are eligible for PTO based on their new rehire date.

Requesting PTO

All Team members must submit PTO through our company payroll system. The company payroll system verifies the number of days and availability.

Supervisors will be notified of requests for PTO via e-mail from the company payroll system. Your supervisor will consider your available balance and departmental coverage before approving your request.

PTO longer than two weeks at one time may hamper company operations and will not be allowed except in rare situations.

Team members can take PTO that is equal to or less than their scheduled work day.

PTO Policy Guidelines

PTO should be requested well in advance for planning purposes. Late notice requests may be denied due to business needs. PTO of more than four days taken for any surgeries, illnesses, or any other medical reasons of yourself or your family member will require the submission of appropriate medical documentation in accordance to FMLA or to support Paid Medical Leave.

As with any company policy, the submission of intentionally erroneous information may be considered fraud and may result in disciplinary action up to and including termination of employment.

BEREAVEMENT LEAVE

When a death in a team member's immediate family occurs, the team member will be allowed three days paid leave to attend the funeral and handle personal matters. Immediate family includes spouse, parents, siblings, children, grandparents, and includes step-parents, step-siblings, step-children, in-laws in the same categories and/or persons who are under "guardianship" of the team member.

THE FAMILY AND MEDICAL LEAVE ACT (FMLA)

The Family and Medical Leave Act allows eligible team members to request up to 12 weeks of unpaid leave in any 12-month period for one or more of the following reasons:

- Incapacity due to pregnancy, prenatal medical care or childbirth;
- To care for the team member's child after birth, or placement for adoption or foster care. To care for the team member's spouse, domestic partner, son or daughter, or parent, who has a serious health condition; this includes in-laws in the same categories and step-children or persons who are under "guardianship" of the team member.

- For a serious health condition that makes the team member unable to perform their job.
- For purposes of this policy, a "serious health condition" is an illness, injury, or physical or mental condition involving inpatient care or continuing treatment by a health care provider. Requests for leave to care for other seriously ill family members or members of a team member's household will be considered on a case-by-case basis;
- In the case of a covered team member with a military family member in the National Guard or Reserves: to deal with a "qualifying exigency" caused by the family member's deployment on active duty or in support of a contingency operation. Qualifying exigencies include short notice deployments, military events and related activities, childcare and school activities, financial and legal arrangements, counseling, rest and recuperation, post-deployment activities, and in certain situations, other activities agreed upon by the team member and the Company. For more information about this policy, please contact the Human Resources Department.
- In addition, pursuant to the National Defense Authorization Act, the Company also provides Military Caregiver Leave to covered team members. Eligible team members who are family members of covered service members will be able to take up to 26 workweeks of leave in a single 12-month period to care for a wounded service member with a serious injury or illness incurred in the line of active duty. The maximum of 26-weeks includes the 12 weeks of regular FMLA and is not in addition thereto.

Eligibility Criteria for FMLA

To be eligible for leave under FMLA, a team member must fulfill the following criteria:

- Have been employed by the Company (or predecessor company) for at least 12 months; and
- Have at least 1,250 hours of service with the employer during the 12-month period before any leave.

Length of Allowable Leave

FMLA leave may be approved for a maximum of 12 weeks in a 12-month period. For purposes of this policy, a "rolling" 12-month period will be used, measured backward from the date a team member uses any family leave.

Spouses who are both employed by the Company are allowed a combined total of 12 weeks of FMLA leave within a 12-month period for the care of a newborn or adopted child, or to care for a parent with a serious health condition. If leave is requested due to the illness of a child or for the spouse, each spouse is allowed 12 weeks of leave.

In the case of the serious health condition of a family member, team members may request leave in continuous periods, intermittent periods, or by a reduced work schedule, for a total of 12 weeks. In cases of reduced schedules or intermittent leave, a department supervisor may transfer the team member temporarily to an alternative position to accommodate the needs of the work area. In such situations, the team member's salary rate and benefits should remain the same.

Leave to care for a newborn or a newly adopted child should normally be taken in continuous periods and must be taken within 12 months of the birth or placement of the child. Intermittent leave or reduced schedules may be arranged only if agreed to by both the department supervisor and the team member.

Requests for FMLA leave to exceed 12 weeks will be reviewed in accordance with the circumstances of the request, considerations of work coverage, and the provisions of the general policy on leave without pay.

Requesting FMLA Leave

Team Members are expected to provide as much advance notice of the need for leave as possible to enable planning for coverage in the team member's absence.

Applications for Leave of Absence (LOA) are available from the Payroll Department. (The application indicates the necessary documentation required depending upon the type of leave requested.)

Certification from a qualified health care provider will be required for approval of leave to care for a seriously ill or injured family member. Such certification should be provided before the leave begins (or as soon as possible) and should include:

- The date on which the illness or condition began;
- The estimated duration of the condition;
- A statement that the illness or condition warrants the team member to provide care; and,
- The dates and duration of treatments to be given.

The Company may require that a second medical opinion be obtained. In the event of conflicting opinions, the Company may ask for a third and final provider to offer a binding decision. Additional certification may be requested for any extension of a leave period beyond the dates originally approved.

Continuation of Benefits During FMLA, Paid Medical Leave, and Maternity Leave

Insurance benefits for which the team member is enrolled will continue during FMLA, Paid Medical Leave and Maternity Leave but mutually acceptable terms for reimbursement of the team member's benefit portion should be made with the Human Resources Department. While on non-FMLA unpaid leave you are responsible for the full premium payment for benefits you are enrolled in, as of the initial date of that unpaid leave.

Use of PTO, Paid Medical Leave, or Paid Maternity Leave During FMLA

The Company requires the team member to use their PTO days up to 40 hours. Paid Medical Leave and Paid Maternity Leave will be paid as of the first day of hospitalization. PTO and Paid Medical or Maternity Leave will be taken concurrent with the 12 weeks of unpaid FMLA. Team members are encouraged to keep 40 hours of PTO in reserve, unless in the last quarter of the year, so leave does not run out early.

Returning from FMLA

At the completion of the approved leave period, a team member will be reinstated to his or her former position or a position of equivalent classification and pay within the organization.

Questions relating to the provisions and eligibility requirements for FMLA should be directed to Human Resources and/or Senior Management. Upon returning to work, the Company requires a doctor's certification that the team member is fit for duty. This certification needs to be a statement of a team member's ability to return to work.

UNPAID LEAVE (NOT FMLA)

Requests for unpaid personal leave must be submitted in writing to your supervisor. Your supervisor may approve the leave if it is for a mutually agreed upon time, and if it does not inconvenience operations. The initial leave is limited to a three-month period, but an extension may be granted. Once you receive initial approval, a **Request for Leave of Absence form** must be completed, signed by your supervisor and forwarded to the Human Resources department. The Human Resources department must approve leave in writing to protect your prior employment service and benefits eligibility. While on non-FMLA unpaid leave you are responsible for the full premium payment for benefits you were enrolled in as of the initial date of that unpaid leave.

PAID MEDICAL LEAVE

The purpose of Paid Medical Leave is to protect team members against loss of income due to the team member's own serious health condition that requires that the team member be off work for an extended period of time. Paid Medical Leave will allow any qualifying exempt and non-exempt team members to receive up to 4 weeks / 160 hours of salary continuation. All Paid Medical Leave must be authorized by the Human Resources Department.

Eligibility Criteria

To be eligible, team members must be unable to work their regular duties or in a light duty capacity due to a serious health condition as that term is defined under the Family Medical Leave Act. Team members must also have worked for the Company for at least one year before being eligible for Paid Medical Leave. In addition, team members must have worked at least 1250 hours in the year preceding the Paid Medical Leave. If a team member has taken Paid Medical Leave or Paid Maternity Leave (discussed below) within one year preceding the serious health condition necessitating the leave, he or she is ineligible for Paid Medical Leave. Paid Medical Leave may not be used for intermittent leave.

Team members working non-typical rotating shifts are eligible for Paid Medical Leave as paid at typical 40-hour work weeks, not to exceed 160 hours of straight-time pay. Team members who are on leave due to an injury covered by our workers compensation insurance are ineligible for Paid Medical Leave, as they are compensated by the Company's workers compensation insurance carrier.

Interrelation with FMLA, PTO, and Paid Medical Leave Policies

Team members must first use available PTO before being eligible for Paid Medical Leave, unless initially hospitalized.

Team members must submit the FMLA Physician's certification form to be eligible for Paid Medical Leave. Paid Medical Leave will run concurrently with FMLA leave.

Before returning to work from extended leave, team member will provide a physician's statement releasing the employee to return to work.

If all paid leave is exhausted, the team member may be placed on leave without pay during the remainder of the FMLA absence.

PREGNANT WORKERS FAIRNESS ACT (PWFA)

In accordance to the PWFA, we will engage in the interactive process and make reasonable accommodations for physical or mental limitations related to pregnancy, childbirth, or related medical conditions, irrespective of whether the conditions rise to the level of a "disability" under the Americans with Disabilities Act (ADA), as long as such accommodations do not cause undue hardship to the company.

PAID MATERNITY LEAVE

The purpose of Maternity Leave is to protect team members against loss of income due to the delivery of a child that requires the team member be off work for an extended amount of time. Paid Maternity Leave will allow any qualifying exempt or non-exempt team member to receive up to 4 weeks/160 hours of salary continuation. All Paid Maternity Leave must be authorized by the Human Resources Department.

Eligibility Criteria

Team members must have worked for the company for at least one year before being eligible for Paid Maternity Leave. In addition, team members must have worked at least 1250 hours in the year preceding the Paid Maternity Leave. If a team member has taken Paid Medical or Maternity Leave within the one year preceding the serious health condition necessitating the leave, she is ineligible for Paid Maternity Leave. Paid Maternity Leave may not be used intermittently.

Interrelation with FMLA, PTO, and Paid Maternity Leave Policies

Team members are eligible for Paid Maternity Leave. Paid Maternity Leave will run concurrently with FMLA leave.

Team members must turn in the FMLA Physicians certification form in order to be eligible for Paid Maternity Leave. Paid Maternity Leave will run concurrently with FMLA leave.

Before returning to work from extended leave, team members must provide a physician's statement releasing the team member to return to work.

If all paid leave is exhausted, the team member may be placed on leave without pay during the remainder of the FMLA absence.

Interrelation with Workers Compensation (WC) and Americans with Disabilities Act (ADA)

Time off granted under consideration of the ADA or in conjunction with a WC injury or illness may also run concurrently with time taken under FMLA. Please consult with your HR representative for details.

MILITARY LEAVE OF ABSENCE

In accordance with federal and state law, it is Lewis Energy Group's policy that no team member or prospective team member will be subjected to any form of discrimination on the basis of that person's membership in or obligation to perform service for any of the uniformed services of the United States. Specifically, no person will be denied employment, reemployment, promotion or other benefit of employment on the basis of such membership. Furthermore, no person will be subjected to retaliation or adverse employment action because such person has exercised his or her rights under applicable law or this policy. If any team member believes that he or she has been subjected to discrimination in violation of this policy, the team member should immediately contact Human Resources.

Eligibility

Team members taking part in a variety of military duties are covered under this policy. Such military duties include leaves of absence taken by members of the uniformed services, including active duty, reserve or National Guard, for training, periods of active military service and funeral honors duty, as well as time spent being examined to determine fitness to perform such service. This policy also covers individuals serving in the active components of the armed forces and the National Disaster Medical System (NDMS) as well as reservists for the Federal Emergency Management Agency (FEMA) when they are deployed to disasters and emergencies on behalf of FEMA. Subject to certain exceptions under the law, these benefits are generally limited to five years of leave of absence.

Procedures for Military Leave

Unless military necessity prevents it, or is otherwise impossible or unreasonable, a team member should provide Lewis Energy Group with notice of the need for leave as far in advance as is reasonable under the circumstances.

To request a temporary or extended military leave of absence, the team member should generally obtain a request for leave of absence form from HR. Written notice is preferred, but not required under the law or this policy.

HR will review the request for leave of absence, collect any applicable insurance premiums from the employee, generate other applicable documents and process the leave of absence accordingly. In the event of verbal notice by the team member, HR will document the military leave on a leave of absence form.

Team members on temporary or extended military leave may, at their option, use any or all accrued paid vacation or personal leave during their absence.

When the team member intends to return to work, he or she must make an application for reemployment to HR within the application period set forth below. If the employee does not intend to return to work, he or she should notify HR as soon as practicable.

Benefits

If a team member is absent from work due to military service, benefits will continue as follows:

A team member on extended military leave may elect to continue group health insurance coverage for the team member and covered dependents under the same terms and conditions for a period not to exceed 31 days from the date the military leave of absence begins. The employee must pay, per pay period, the premium normally paid by the employee. After the initial 31 day period, the employee and covered dependents can continue group health insurance for up to 24 months at 102% of the overall (both employer and employee) premium rate. Team members must elect coverage and make the required payments to HR in a timely manner to continue coverage.

The group term life/AD&D insurance provided by Lewis Energy Group will terminate the day the team member becomes active military.

The group long term disability insurance provided by Lewis Energy Group will terminate the day the employee becomes active military.

Voluntary supplemental life/AD&D insurance will terminate the day the team member becomes active military. Converting to an individual policy may continue voluntary dependent life insurance coverage. To exercise this conversion option, dependents must submit a written application and the first premium payment to the insurance company within 31 days immediately following the termination of coverage.

Team members do not accrue PTO while on military leave of absence status.

With respect to Lewis Energy Group's retirement plan, upon reemployment, team members who have taken military leave will be credited for purposes of vesting with the time spent in military service and will be treated as not having incurred a break in service. Immediately upon reemployment, the team member may, at the team member's election, make any or all team member contributions that the team member would have been eligible to make had the team member's employment not been interrupted by military service. Such contributions must be made within a period that begins with the team member's reemployment and that is not greater in duration than three times the length of the team member's military service. Team members will receive all associated company match for such contributions.

Re-employment

Upon a team member's prompt application for reemployment (as defined below), a team member will be reinstated to employment in the following manner depending upon the team member's period of military service:

- *Less than 91 days of military service* – reinstated to a position that the team member would have attained if employment had not been interrupted by military service; or, if found not qualified for such position after reasonable efforts by Lewis Energy Group, in the position in which the team member had been employed prior to military service.
- *More than 90 days and less than 5 years of military service* – reinstated to a position that the team member would have attained if employment had not been interrupted by military service or a position of like seniority, status and pay, the duties of which the team member is qualified to perform; or, if proved not qualified after reasonable efforts by Lewis Energy Group, in the position the team member left, or a position of like seniority, status and pay, the duties of which the team member is qualified to perform.
- *Team member with a service-connected disability* - if after reasonable accommodation efforts by the employer, a team member with a service-connected disability is not qualified for employment in the position he or she would have attained or in the position that he or she left, the team member will be employed in another position of similar seniority, status and pay for which the team member is qualified or could become qualified with reasonable efforts by Lewis Energy Group; or, if no such position exists, in the nearest approximation consistent with the circumstances of the team member's situation.

Application for Re-employment

A team member who has engaged in military service must, in order to be entitled to the re-employment rights set forth above, submit an application for re-employment to HR according to the following schedule:

- *If service is less than 31 days (or for the purpose of taking an examination to determine fitness for service)* - the employee must report for reemployment at the beginning of the first full regularly scheduled working period on the first calendar day following completion of service and the expiration of eight hours after a time for safe transportation back to the team member's residence.
- *If service is for 31 days or more but less than 181 days* - the team member must submit an application for re-employment with HR no later than 14 days following the completion of service.
- *If service is over 180 days* - the team member must submit an application for re-employment with HR no later than 90 days following the completion of service.
- *If the team member is hospitalized or convalescing from a service-connected injury* - the team member must submit an application for reemployment with HR no later than two years following completion of service.

Exceptions to Re-employment

In addition to the team member's failure to apply for re-employment in a timely manner, a team member is not entitled to reinstatement as described above if any of the following conditions exist:

- Lewis Energy Group's circumstances have so changed as to make reemployment impossible or unreasonable.
- Re-employment would pose an undue hardship upon Lewis Energy Group.
- The team member's employment prior to the military service was merely for a brief, non-recurrent period and there was no reasonable expectation that the employment would have continued indefinitely or for a significant period.
- The team member did not receive an honorable discharge from military service.

General Benefits Upon Re-employment

Team members re-employed following military leave will receive seniority and other benefits determined by seniority that the employee had at the beginning of the military leave, plus any additional seniority and benefits the employee would have attained, with reasonable certainty, had the individual remained continuously employed. A team member's time spent on active military duty will be counted toward eligibility for FMLA leave. Additionally, upon re-employment, a covered team member will not be discharged except for cause for up to one year following re-employment.

Documentation

The Human Resources will, upon the team member's re-application for employment, request that the team member provide Lewis Energy Group with military discharge documentation to establish the timeliness of the application for reemployment, the duration of the military service, and the honorable discharge from the military service, if applicable.

Company Paid Holidays

Regular full-time team members who have completed their first 90-days are eligible for the following holidays:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Friday After Thanksgiving Day
- Christmas Day

In the event a team member is required to work on a scheduled holiday, he/she will be paid double time for any work performed. PTO and holidays will be paid at the regular rate of pay.

SECTION 8: CURRENT BENEFIT PACKAGE INFORMATION

WORKER'S COMPENSATION INSURANCE (WC)

In the event of an accident or illness caused by working conditions, the workers compensation insurance program is activated. WC offers medical, surgical, and hospital treatment and pays for lost wages beginning after the seventh day away from your job.

If you are injured on the job, regardless of how minor, you must report it in accordance with Company reporting procedures discussed in Section 9 of this Policy Manual.

In order to return to work the team member must provide a Form 73 Work Status Form to HSE. After approval, the employee will report to their respective supervisor for work.

THE LEWIS RESOURCE MANAGEMENT 401(K) RETIREMENT SAVINGS PLAN

ADP, trustee for our plan, is available 24 hours/7 days a week via telephone and online, which include participant services such as account balances, reallocation of fund balances, election reallocation, loan requests and current loan information. Full-time regular team members are eligible to participate after completing one month of service. The company matches 100% of the first 3% of pay that you contribute and 50% of the next 2% for a total of 4% employer matching. Therefore, if you contribute 3%, the company will contribute 3%. If you contribute 5%, the company will contribute 4%, the maximum employer contribution.

You may call the 800-number or go online to enroll. To enroll for the first time, please use a "one-time" Personal Identification Number (PIN), this consists of the last four digits of your Social Security Number. For questions on enrolling, contact your Payroll representative.

Team members may borrow (a minimum of \$500) up to 50% of the total value of your vested accrued benefit minus any outstanding loan balances. You have access 24/7 to 866-MYKPLAN (866-695-7526) or online at (www.mykplan.com) for loan information.

TEAM MEMBER INSURANCE PLANS

Listed below is a brief summary plan description of each plan the Company currently offers to regular full-time team members on the first day of the month after hire date. Spouses and eligible dependents may participate in the company benefits as noted in the Summary Plan Descriptions. Attempting to cover an ineligible person or providing inaccurate information could result in disciplinary action, including termination of employment with the company.

Section 125 Cafeteria Plan

You have a choice to participate in the Cafeteria Plan, which allows team members to deduct the cost of medical, dental and vision premiums on a tax-free basis.

Benefit Options

The company offers a variety of benefit options that allows team members to customize their benefits to meet personal needs. Team members can choose from a selection of benefit options including:

- Health Insurance
- Flexible Spending Accounts
- Health Saving Accounts
- Dental Insurance
- Vision Plan
- Employer Paid Life Insurance
- Voluntary Life Insurance
- Employer Paid Accidental Death & Dismemberment
- Voluntary Accidental Death & Dismemberment
- Employer Paid Long Term Disability
- Short-Term Disability
- Critical Illness
- Accident and Hospital Indemnity Policies
- Identity Theft

The Prudential Employee Assistance Program (EAP), through Guidance Resources, is a company-sponsored service that is available to you and your dependents to provide confidential support, resources, and information to get through life's challenges. Call 800-311-4327 or visit guidanceresources.com. For full details, exclusions and limitations please refer to the policy plan documents.

For Qualifying Life Events, team members have 30 days from the effective date to make changes to their insurance.

COBRA (Consolidated Omnibus Budget Reconciliation Act)

In compliance with the Consolidated Omnibus Budget Reconciliation Act (COBRA), the Company will continue to offer insurance for employees and their "qualified beneficiaries" (generally spouses and dependent children) for up to eighteen months after layoff or termination of employment of the covered team member for reasons other than gross misconduct. Qualified beneficiaries of the covered team member are entitled to:

- hospital insurance coverage for up to thirty-six months after the death of the covered team member
- separation or divorce
- if the covered team member becomes entitled to Medicare benefits; or age or other restrictions to coverage contained in the health plan becomes effective.

Also, if the covered team member is "disabled" (according to the Social Security Act) at the time of the event causing a loss of coverage, the team member may be entitled to up to twenty-nine months of continued coverage.

Any team member or qualified beneficiary who participates in COBRA shall be subject to any and all changes in health plan offered to current company team members. Also, any team member or qualified beneficiary in COBRA are required to pay all premiums and costs of continued coverage.

INTERNAL TRANSFER AND JOB BIDDING POLICY

The Company encourages promotions from within. When a job vacancy occurs, Team members may apply via the Team Member portal to indicate their interest in being considered for a specific position.

Because of the competitive nature of our business, the recruitment process occurs internally and externally simultaneously. At times, when a vacancy occurs in a business unit, a team member may be promoted and the job bidding process will be waived. It is intended that the job bid process is used as often as practicable to provide career opportunities for team members.

Eligibility

- Hourly staff must have completed 6 months and exempt staff completed 1 year in the current position.
- The team member must not have received a Final-Written Performance Improvement Notice within the past 6 months.
- Temporary staff members will be considered as an external candidate.
- Any exceptions must be approved by Human Resources.

Procedure:

All positions below Director-level will be posted unless it is determined to be in the best interest of the Company not to. Examples of such waivers include attempting to place impacted team members from a layoff/reorganization, interdepartmental promotions, or prior candidate pools.

Human Resources will post the vacancy announcements on the web site and team member portal. Team members interested in applying for a vacant position may do so via the Team Member portal as an internal applicant. The Team Member should notify their supervisor if they are being considered for a position.

During the posting period, the Company will accept on-line applications from internal and external candidates. Those candidates submitting an application after the posting period will not be considered.

External recruitment and advertising may be undertaken concurrently with each job opening.

The application of each candidate will be evaluated by Human Resources to determine whether candidates meet the established qualification standards for each position. Team members meeting the established qualification standards will have their application forwarded to the appropriate hiring manager for consideration. The team member's supervisor will be notified by HR if considered for an interview.

Following an offer and acceptance by the team member, the candidate's supervisor will be notified and a transfer date will be determined based on business needs.

SECTION 9: KEY COMPANY POLICIES AND AUTHORIZATIONS

REPORTING PROCEDURES FOR ACCIDENTS, INCIDENTS, ILLNESSES, INJURIES, AND NEAR MISSES

The Company has established policies and procedures to provide statutory accident, incident, illness, injury, and near misses recording and reporting requirements, as well as enable the company to develop focused training programs for reducing occupational accidents, injuries, illnesses and near misses. Additional details on this topic can be found in the [LEG Incident Reporting and Investigations SOP](#) and the [LEG Emergency Action Plan](#).

All team members are to immediately report every accident, incident, illness, and injury that occurs at work to their supervisor, no matter how minor it may appear. Even the slightest of injuries may cause serious infection or later complications.

Reporting Accidents, Injuries, Illnesses, Incidents, and Near Misses

In the event of any person being involved in any incident which is unplanned/uncontrolled in nature, and causes or has the potential to cause harm to the health or safety of team members or other persons, the above procedure must be implemented with accurate and appropriate details recorded. Such events include, but are not limited to, property damage, lost-time incidents, near misses, injury incidents, violence at work, and occupationally related illnesses.

Brief definitions and examples of an accident/incident, near miss, and illness are given below:

Accident/Incident

An unplanned event which causes injury to person(s), damage to property, or a combination of both.

Examples include:

- A fall resulting in a fracture
- Incorrect operation of machinery leading to breakdown

Near Miss

A near miss is an unplanned event which does not cause injury/illness or property damage.

Examples include:

- Articles falling near people
- Short-circuits on electrical equipment

Illness

A work related illness might be:

- Occupational disease, e.g. cramp of the hand or forearm due to repetitive movements
- Infections due to biological agents
- Conditions due to substances

Reporting Procedures

Should medical attention be required, FIRST provide all assistance necessary to the injured person, from the appropriate services below:

- First-Aid Arrangements
- Medical Clinic / Physician
- Hospital Emergency

Utilizing the Emergency Contact List, immediately contact the Safety Department and/or the department supervisor. In an emergency, DO NOT DELAY; call an ambulance directly by calling 911 and ensure the responders are directed appropriately upon arrival.

Team Member Responsibilities:

- Immediately report to his/her direct supervisor and/or the safety department any work related injury, illness, or incidents. This includes immediate accidents (acute injuries) such as cuts, puncture wounds, sprains and burns, as well as those that are of a gradual onset (chronic) such as back pain or repetitive strain.
- Immediately report to his/her direct supervisor and/or the safety department any "near miss" events and/or unsafe work condition(s) and provide necessary details to the appropriate party.
- The team member must assist with the investigation and completion of the Accident/ Incident Report.

Supervisor Responsibilities:

- The supervisor's first priority is to ensure the well-being of the team member.
- Upon notice of the accident or incident, evaluate the severity and nature of the situation.
- Immediately notify the HSE Department. Failure report may result in disciplinary action, up to and including termination.
- Where circumstances warrant an urgent response, cancel other activities and proceed to the accident scene.
- HSE will help complete the Accident / Incident Report as soon as they become aware of the situation (In emergency cases this report may have to be done after the team member has sought medical attention).

Video and Audio Monitoring Devices

In the event any individual is involved in any accident/incident subject of this Section 9, the Company hereby gives notice that if any video or audio monitoring devices were in operation at the time of the incident, any and all such footage may be used for internal incident review and/or training purposes.

Incident Review Board

In the event an injury or illness results in an OSHA Recordable incident or worse, an Incident Review Board shall be assembled to complete an accident investigation and root cause analysis.

Review Team:

- Safety Manager / Technicians
- Injured / Affected Team Member
- Direct Supervisor
- Department Manager (as needed)
- Co-worker(s) / Witness (as needed)
- Company Attorney (as needed)

Fit For Duty

In the event of a recent medical diagnosis, the returning team member should provide a fit for duty release from a medical professional.

EMAIL AND INTERNET USE POLICY

Because your particular job duties may involve use of the Internet, the Company has provided access to the Internet. The Internet is a powerful tool that allows instant and widespread communication that can be of significant benefit to the Company. However, improper use of the Internet can cause substantial harm and even liability. The following rules apply at all times to the use of e-mail systems and internet in the office:

- Personal use of the Internet at work is strongly discouraged. No personal use of the Internet that impedes or interrupts Company business will be allowed. Any personal use shall be conducted during your lunch hour only and is subject to monitoring.
- Storage of personal documents and on-line files on Company computers or servers is prohibited, except as authorized by Company management.
- Sending or receiving personal communications via e-mail at the office is strongly discouraged and must be limited. No personal use of e-mail that impedes or interrupts Company business will be allowed.
- Your use of email system, the internet, and any web sites viewed by you may be monitored and accessed by any Company personnel/member of management, at any time, without prior notification. However, management is not obligated to monitor usage and will not be liable for failure to block any messages.

- Users expressly waive any rights to privacy in anything they create, store, send or receive on the Company's computer system.
- Caution must be observed when forwarding or creating e-mail messages to persons outside the office to ensure the Company's confidentiality. In particular, team members should not send confidential or sensitive information via e-mail, the Internet or the World Wide Web, except as needed for Company business. Sharing confidential information with any person is prohibited except as authorized by Company management. Such confidential information includes, but is not limited to, well logs and files, maps, land files, geological data and files, engineering files, lease agreements, operating reports, accounting files, internal-use forms and programs, plans, trade secrets, strategies, and any other Company files or agreements.
- No team member may e-mail or use Company information for personal purpose or any other purpose unrelated to Company business. Company information is to be used for Company purposes only.
- Team members are prohibited from sending Company information to their personal e-mail accounts without a valid Company reason. Additionally, in the event that a team member is terminated, he/she must immediately cease all use of the Company's e-mail systems and may not e-mail any Company information to anyone, including his/her own personal e-mail account.
- Sending any form of unsolicited junk mail, "for profit" messages or chain letters is prohibited.
- Visiting gambling sites, pornographic sites or sites containing sexually oriented materials is prohibited.
- Downloading or accessing any programs, data, e-mail attachments, streaming audio and/or video, or other material not related to office business is prohibited unless expressly approved by management.
- IT Department personnel and management must have full access to all programs utilized by any office computer. Therefore, no encryption technology or other device may be used by any team member to deny access on any office computer program to IT Department personnel or management.
- Sending harassing, threatening, obscene, discriminatory, libelous, defamatory, inappropriate or other objectionable messages or images via e-mail is prohibited.
- Playing computer games or other video related games while on duty at work is strictly prohibited.
- Use of the Company's computer system to attempt unauthorized access to remote systems is prohibited.
- Forgery or attempted forgery of e-mail messages is prohibited.

- Attempts to read, copy, modify or delete e-mail messages of other users is prohibited unless it is done for legitimate office purposes and/or approved by office administration.
- No team member may participate in any type of financial transactions over the Internet without authorization of Company management.

If you have a question about compliance with this policy, please see your manager or the IT Department before you use the Internet. Management reserves the right to remove Internet access for any team member, at any time, for any reason deemed appropriate by the IT Department or management.

Any team member found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

SOCIAL NETWORKING POLICY

The Company takes no position on your decision to participate in social networking activities. However, it is the right and duty of the company to protect itself from unauthorized disclosure of information. The Company's social networking policy includes rules and guidelines for company-authorized social networking and applies to all executive officers, board members, management, and staff.

General Provisions

Unless specifically instructed, team members are not authorized and therefore restricted from speaking on behalf of the Company. Team members may not publicly discuss clients, products, other team members or any work-related matters, confidential or not, outside company-authorized communications. Team members are expected to protect the privacy of the Company, co-workers, and clients. Disclosing team member and/or proprietary or nonpublic information is strictly prohibited. Such information includes, but is not limited to, customer information, trade secrets, financial information, and strategic business plans.

Team members are cautioned there is no expectation of privacy while using the Internet. Social media postings can be reviewed by anyone. The Company reserves the right to monitor comments or discussions about the company, its team members, clients, and the industry. This includes posts on the Internet about products or competitors by anyone, including team members.

Team members cannot use social networking sites to harass, threaten, discriminate, or disparage against co-workers or anyone associated with or doing business with the Company.

Team members cannot post on social media the name, trademark or logo of the Company or any business with a connection to the Company. Team members cannot post company-privileged information, including copyrighted or company-issued documents. Team members cannot post photographs of other team members, clients, vendors, or suppliers, nor can team members post photographs of persons engaged in company business or at company events.

Team members cannot post advertisements or photographs of company products, nor sell company products and services. Links from a personal blog or social networking site to the Company's internal or external web site is strictly prohibited.

The Company encourages team members to report possible or perceived violations to supervisors or the Human Resources Department.

Violation of the company's social networking policy will result in disciplinary action up to and including immediate termination of employment. The Company reserves the right to take legal action where appropriate against team members who engage in prohibited or unlawful conduct on social media.

Only authorized team members can prepare, modify, or delete content for the Company's website and/or social networking entries. Content must be relevant, add value and meet the specified goals or purposes developed by the Company.

If contacted by the media or press about a social media post related to Company business, team members are required to speak with their manager before responding.

Due to security reasons, no information regarding location or travel plans of any Company executive can be posted on any social media, at any time.

If you have any questions relating to this policy or social networking, ask your manager or Human Resources.

COMPANY PROPERTY DAMAGED OR NOT RETURNED

By acknowledging the handbook, team members authorize the Company to deduct from their paychecks the replacement value of any company property destroyed or rendered inoperable, as a result of personal negligence, as well as any company property not returned upon separation or at the request of company management.

ANTI-BRIBERY AND FOREIGN CORRUPT PRACTICES ACT POLICY

Scope

This policy applies to all Lewis Energy Group team members worldwide. The purpose of this policy is to ensure that Lewis Energy Group business is conducted in accordance with our Code of Business Conduct and Ethics (the "Code"), and with applicable anti-bribery and anti-corruption standards and laws.

Foreign Corrupt Practices Act

In every country in which Lewis Energy Group does business, it is unlawful to make a payment to a government official for the purpose of obtaining or retaining business or for a competitive business advantage. In the U.S., the Foreign Corrupt Practices Act ("FCPA") forbids certain payments and other practices in connection with our business activities. The FCPA carries criminal and monetary penalties for its violation and should be taken very seriously by all team members. Management has determined that all of Lewis Energy Group's activities will be conducted in full compliance with the requirements of the FCPA and other applicable laws and regulations, including the applicable laws of the countries in which we conduct business.

Under the antibribery provisions of the FCPA, U.S. citizen, nationals, corporations and officers, team members and agents acting on their behalf, are prohibited from corruptly offering or giving money or other things of value to a foreign official (including team members of foreign governments and of government-owned companies), and official of a foreign political party, a candidate for foreign political office or a foreign political party, for the purpose of (i) influencing any act of decision of such an official, party or candidate, in his or its official capacity; (ii) inducing such an official, party or candidate "to do or omit to do" any act in violation of his or its lawful duty; or (iii) inducing such an official, party or candidate to use his or its influence with a foreign government or instrumentality to affect or influence any government act or decision, in order to assist the donor in obtaining or retaining business or directing business to any person.

Facilitating Payments

Facilitating Payment, payments to facilitate or expedite "routine governmental action" are exempted from the prohibitions of the FCPA. Facilitating payment involves the nondiscretionary exercise of governmental authority. For example, facilitating payments may be made to obtain permits, licenses or other official documents to qualify a person to do business in a foreign country, process government papers such as visas and work order, provide police protection, phone service, power and water supply. A facilitating payment may be prohibited by the laws of the country that Lewis operates in. All facilitating payments must be approved by the manager of the relevant country.

Suspect Situations

Payments to Intermediaries

There have been a significant number of FCPA prosecutions and enforcement actions involving agents, subcontractors and consultants ("Representatives"). Money or property passed through a consultant to a public official to obtain certain government actions is prohibited. Contact the country manager prior to using consultants who are connected with the government or a political party of the country in which Lewis Energy Group is doing business.

Gifts, Entertainment, and Travel

Many alleged acts of corruption arise in the context of gifts, entertainment, and travel. Extravagant entertaining of team members of government-owned companies, other government officials or political party official or their families and paying for travel of any of the foregoing have the potential to involve violations of the FCPA and local laws. Approval of country manager must be obtained before any extravagant gifts, entertainment, and travel benefits may be given by Lewis Energy Group team members in connection with Lewis Energy Group's business.

Charitable Contributions

A charitable contribution is illegal under some anti-bribery laws, including the FCPA, if the contribution is intended to improperly influence a government official. Lewis Energy Group team members who receive requests for charitable contributions in connection with business, legislative or regulatory interaction with a government official should first consult with Human Resources.

Political Contributions

Contributions to political parties, party officials, candidates for political office, and persons closely related to them can also raise issues under anti-corruption laws. No Lewis Energy Group team member may, except with prior approval from Human Resources, make any political contribution, either monetary or in-kind, on behalf of Lewis Energy Group or use Lewis Energy Group's name, funds, property, equipment or services for the support of any political party, initiative, committee or candidate.

Books and Records

Our Code requires accurate recordkeeping. Expenditures from petty cash funds should have supporting documentation and standard invoicing procedures should be followed. Payments in excess of normal fees to customs agents or officials to obtain clearance of items through customs or importation of equipment into a country may raise a red flag involving violation of FCPA. Regardless of the type of transaction, all books and records established by Lewis Energy Group's team members must be complete and accurate. Lewis Energy Group team members must never consent to the creation of false or misleading documents.

Working with Agents, Subcontractors and Consultants

All Representatives should be investigated prior to engagement to ascertain their reputation, character, experience and work background. All Representatives shall have a written contract specifying the services to be performed and their compensation.

All contracts with vendors for work to be performed outside of the United States should include language prohibiting either party from making payments in violation of the applicable antibribery and anti-corruption laws.

Monitoring Compliance and Seeking Assistance

Lewis Energy Group managers must vigilantly comply with anti-bribery and anti-corruption laws, the Code, and this policy. If any Lewis Energy Group team member becomes aware of or suspects a bribe or other corrupt act, or has a question or concern about anti-bribery or anti-corruption compliance, he or she should contact the General Counsel, legal manager of that country, if applicable, or the Fraud, Waste and Abuse Hotline. The Hotline phone numbers are as follows: from the United States 855-900-0047 for English and 800-216-1288 for Spanish; from Mexico 001-800-216-1288 for access and then dial 800-603-2869 for Spanish. Lewis Energy Group will not tolerate any retaliation against a team member who honestly reports an issue or concern regarding compliance.

Conflicts of Law

The expansion of anti-bribery and anti-corruption laws in countries where Lewis Energy Group does business, and particularly transnational bribery laws similar to the U.S. Foreign Corrupt Practices Act makes it possible that Lewis Energy Group team members will encounter situations where local law may be inconsistent with the FCPA or other applicable national laws. If such potential conflicts of law occur, contact General Counsel, legal manager of that country, if applicable or the Fraud, Waste and Abuse Hotline before proceeding.

Responsibilities

All Lewis Energy Group team members have the responsibility to report any actual or suspected violations of this policy to their manager or the proper Lewis Energy Group authorities. Willful blindness or conscious disregard for suspicious activities may be viewed as a violation of this policy.

Questions concerning the FCPA may be directed to the Legal Department. Team members are urged to ask questions whenever they have even the slightest reason to doubt the propriety of a particular activity, transaction or payment. The text of the Foreign Corrupt Practices Act can be found at <http://www.justice.gov/criminal/fraud/fcpa/>

CODE OF BUSINESS CONDUCT AND ETHICS

Policy Overview

It is the policy of Lewis Energy Group, L.P. and its subsidiaries (collectively, Lewis or the "Company") that the conduct of team members and others who do business with or on behalf of Company shall be based upon high ethical standards and in compliance with the law. All team members of the Company are expected to adhere to the principles described in this Code of Business Conduct and Ethics (the "Code").

At Lewis, everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concern. Lewis will investigate all reported instances of questionable or unethical behavior. Those violating the standards in this Code will be subject to disciplinary action. If you become aware of a situation that you believe may violate this Code, you should report your concerns immediately in accordance with the procedures described in the Code.

Conflict of Interest

All team members have the responsibility to ensure that business decisions are based solely on what is best for the Company and are not improperly influenced by personal interests. A "conflict of interest" exists when a person's personal interest interferes with the interests of the Company or makes it difficult for a person to perform his or her Company work objectively and effectively. Conflicts of interest may also arise when a team member, or a member of his or her family, receives improper personal benefits as a result of his or her position in the Company.

Conflicts of interest are prohibited as a matter of Company policy, unless proper approvals have been obtained. Actions or situations that might involve a conflict of interest, or the appearance of one, should be fully disclosed, including the following:

- Working simultaneously for a competitor, customer, contractor or vendor or owning a financial interest in any outside enterprise which does or seeks to do business with or is a competitor of the Company. This provision does not apply to the ownership of the securities of a publicly traded entity as long as such ownership represents less than five percent (5%) of the outstanding securities.
- You must disclose if any members of your family are employed by vendors, contractors, customers or competitors of Lewis.
- Financial interest in vendors, contractors, customers or competitors.
- A team member exercising discretionary authority or making or influencing any recommendation or decision on behalf of Lewis that would result in an undisclosed personal financial benefit to team member or to members of his or her family.
- Taking a part-time job where you may spend time on that job during your normal Lewis working hours or using Lewis equipment or materials.
- For a related-party transaction involving any other employee and Company, prior written approval of the President of Lewis Energy Group is required.

Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with the President of Lewis Energy Group, Legal Department or Human Resources Department.

Compliance with Laws, Rules & Regulations

All team members must respect and obey the laws, rules, and regulations of the countries in which we operate. The following is a brief summary of certain topics about which team members should be aware.

Bribery is Always Prohibited

Bribery of any government official in any country is strictly against Company policy, even if the refusal to make such a payment would result in the Company losing a business opportunity. Almost every country that Lewis operates in prohibits the bribery of its officials. In addition, many countries have laws that make it illegal to bribe officials of other countries. In the United States, that law is the Foreign Corrupt Practices Act (FCPA). Team members with duties involving transactions or travel outside of the United States must be familiar with this Act. Any gift or payment to any government authority must be approved by the President of Lewis Energy Group.

Export Controls/Economic and Trade Sanctions

Many countries regulate international trade transactions, such as imports, exports and international financial transactions. The United States prohibits any cooperation with trade boycotts against countries friendly to the United States or against firms which may be "blacklisted" by certain groups or countries. Lewis is committed to complying with such regulations, including licensing, shipping documentation, import documentation, reporting and records retention requirements of all countries in which you conduct business.

The United States also prohibits trade and other commercial dealings between U.S. persons, corporations and, in some cases, foreign subsidiaries, from doing business with certain countries, groups, and individuals. U.S. laws and regulations also may restrict investment in certain goods, technology and services with a targeted country. Lewis team members must seek advice from the Legal Department if they have any questions about whether a particular transaction is permissible under applicable law. Violations of these laws can result in substantial fines and/or imprisonment for violators.

Health and Safety

Lewis' greatest asset is its people, which means safety is a key priority. For this reason, we are committed to pursuing the highest health, safety, security and environmental standards. Each team member has the responsibility to comply with all applicable health, safety and environmental rules and regulations, as well as all posted safety procedures within our areas of operation.

No activity is so important that we cannot take the time to do it safely. We consistently promote safe work practices and avoid risk to our fellow team members, our neighbors and the environment. We also implement the programs, training and internal controls necessary to achieve these goals. If you have a concern about workplace health, safety or security, please contact you're your supervisor, HSE representatives or Human Resources.

Business Records and Disclosures

The Company expects honest and accurate recording of business information in accordance with legal requirements. False or misleading accounting records transactions, books and reports (including expense reports) are strictly prohibited. All payments by the Company for goods or services should be described accurately and fairly in the Company's financial records, should be supported by documentation, and must be made only for the purposes described in the documents and records supporting the payment.

Special care is required regarding the public release of information concerning the Company's business, strategies, activities and plans. All media contact and public statements and discussions of Company business should be referred to Human Resources or the Legal Department.

Reporting Procedures

Team members should promptly raise any concern that they have about possible violations of this Code or any Company Policy. In some circumstances, a waiver of a policy may be warranted. You may raise these concerns with a Company manager, or, if you prefer, with Human Resources, the Legal Department or the Fraud Waste and Abuse Hotline 855-900-0047. Your communication may be written or oral, and it may be anonymous.

Lewis strictly prohibits any team member from retaliating or taking adverse action against anyone for raising or helping to resolve a policy concern.

DRUG AND ALCOHOL POLICY

It is the continuing policy of the Company to provide a safe and healthy workplace for all team members. Consistent with this Policy is a commitment to maintain all Company Premises free from the adverse effects of drugs and alcohol. Company Premises as used herein include, but are not limited to Company owned, rented, used, or leased property including field locations, work sites, drilling locations, offices, parking lots, grounds, vehicles or equipment. Likewise, all team members on duty are prohibited from using or being under the influence of illegal drugs, alcohol, or prescription drugs not prescribed by a medical provider.

It is also our continuing policy to employ only those contractors in compliance with the requirements of all federal and state regulations including pipeline safety and drug testing.

Application of Drug and Alcohol Policy

1. The manufacture, distribution, possession, purchase, sale or use of illegal or unauthorized drugs on Company Premises or while a team member is on duty is prohibited. Unauthorized drugs shall include, without limitation marijuana or cannabis in all forms. The consumption or possession of alcohol in unsealed or opened containers on Company Premises or while on duty is also prohibited, except in highly limited circumstances, specifically authorized by the CEO.

2. Team members when reporting for work and on the job are required to be: i) fit for work; ii) free of illegal or unauthorized drugs in their bodies; and iii) free from the effects of alcohol. A team member shall be deemed in violation of this policy if the results of a blood alcohol test are .04 gm/dl or greater. Impaired physical or mental performance or a test level less than .04 gm/dl may also render someone in violation of this Policy.
 - Team members that are on-call are prohibited from using alcohol within four hours prior to reporting to duty. If a team member is notified to respond to an emergency, the team member must not use alcohol once notified. In the case of an emergency, the Company is prohibited from utilizing a team member if the Company has actual knowledge that the team member has used alcohol within the time period after the team member has been notified to report to duty. It is the responsibility of the team member to notify his or her immediate supervisor that he/she is under the influence of alcohol and cannot report for duty.
 - Team members taking prescribed and over the counter drugs are responsible for following the instructions provided by the prescribing physician and the manufacturer of such drugs. The intentional abuse or misuse of such drugs will result in such drugs being deemed unauthorized drugs for purposes of the Policy during such periods of abuse or misuse. It is the responsibility of the team member to report any adverse effects while taking prescribed and over the counter drugs to his or her immediate supervisor.
3. The Company and its team members must adhere to the following requirements:
 - A team member is required to notify Human Resources within five days of his/her notice of any charge, conviction or investigation for the violation of a drug related and alcohol-related criminal offense. The team member will be subject to appropriate disciplinary action up to and including termination of employment.
 - The Director of Human Resources and General Counsel will determine if an individual convicted of violating a drug-related or alcohol-related criminal offense on Company Premises, was engaged in a federal contract or subcontract at the time and, if so, will take appropriate action to comply with all legislative or regulatory requirements.
4. Drug and/or alcohol testing where legally permissible will be required under the following circumstances:
 - As part of a pre-employment test and/or physical examination subsequent to an offer of employment.
 - As required for cause, when a team member appears unfit for work. A team member shall be presumed unfit for work if the employee's physical or mental ability appears to be impaired or inconsistent with operating or safety procedures based on demonstrated judgment, performance, actions, or coordination.

- As required for cause, when there is reasonable basis to suspect drug or alcohol use, possession, abuse or misuse.
- When a team member is involved in a potentially chargeable auto accident (not necessarily resulting in receipt of medical attention) or receives a serious injury which would be OSHA recordable. Such incident must be reported immediately to Safety and Human Resources, who will determine if the incident is a potentially chargeable or OSHA recordable event.
- As required for cause, when a team member is involved in or has contributed to an unsafe practice, accident or injury and there is a reasonable basis, based upon the circumstances of the unsafe practice, accident or injury to suspect that the unsafe practice, accident or injury may have resulted from or been contributed to by the employee's consumption or use of drugs and/or alcohol.
- As required by federal, state or local regulations including random testing required by the Department of Transportation (DOT) or as determined necessary for the health and welfare of Company team members. Universal mandatory testing of all team members will occur from time to time.

The failure to test, however, where testing is impracticable under the circumstances does not preclude a team member from being found in violation of this Policy where such violation is otherwise substantiated.

5. Refusal to submit to drug and/or alcohol testing, as set forth in Paragraph 4 above shall result in appropriate disciplinary action up to and including termination of employment.
6. No advance notice will be given to team members and applicants scheduled for drug and/or alcohol testing.
7. Drug and alcohol testing may be performed through analysis of blood (where legally required or permissible), urine, breath, saliva, or other tissues. Testing shall be done by qualified HSE team members or a qualified clinic meeting state and federal standards.
8. A positive test as part of a pre-employment examination or refusal by an applicant to submit to drug and/or alcohol testing shall result in the withdrawal of any offer of employment or employment consideration.
9. If a team member is found to be in violation of this drug policy, he/she will be subject to appropriate disciplinary action up to and including termination of employment. No rehabilitation program will be offered (unless part of DOT regulations).

10. Team members who voluntarily seek rehabilitation assistance before they have a performance problem or before the Company is aware of a potential violation of the Policy shall, upon request, be referred to an outside physician or agency for evaluation at the Company's expense. If the evaluation or diagnosis indicates addiction or abuse, successful completion of an approved rehabilitation program will be required as a condition of continued employment. If rehabilitation is required then:
- The cost of any rehabilitation program and/or treatment will be paid for entirely by the team member. Based on eligibility, team members will be offered paid medical leave during rehabilitation and/or treatment.
 - The team member must arrange to participate in an approved rehabilitation program within seven (7) days of receiving the results of his/her evaluation. If the team member does not choose rehabilitation or fails to provide satisfactory proof of completion of rehabilitation he/she shall be subject to appropriate disciplinary action up to and including termination of employment.
 - Following successful completion of a drug or alcohol rehabilitation program, any subsequent positive finding in a drug and/or alcohol-screening test may result in termination of employment.
11. Drug and alcohol testing results shall be treated with strict confidentiality to protect the team member's rights and privacy. In the event an applicant or team member files a charge, a lawsuit or otherwise presents any issue involving or requiring proof of the results of the test(s), the Company-designated MRO shall make available the relevant medical record(s) to the Company's representative(s) responsible for resolution of the issue and the Company shall be entitled to use those records in any proceeding in which they may be relevant.
12. Human Resources, in consultation with the MRO and our attorney shall periodically review i) drug and alcohol screening procedures; ii) laboratory services being used; iii) standards for ensuring the full reliability and accuracy of drug and/or alcohol tests; and iv) procedures governing the chain of custody of specimens collected for drug and/or alcohol testing.
13. Team members who violate this Policy, including the refusal to submit to drug and/or alcohol testing, are subject to disciplinary action, up to and including termination of employment.
14. Vendors, contractors and visitors shall be expected to observe the Drug and Alcohol Policy while on Company property, in office areas and in Company-owned or leased vehicles and/or on Company assignment. Failure to observe this Policy may result in, but not be limited to, eviction and prohibition from Company property and offices.

15. The Company provides in its agreements with contractors that drug and/or alcohol testing, education and training required by federal and state regulations is required. The contractor shall be required to allow access to its property and records by the Company for the purpose of monitoring the contractor's compliance. Upon request, the contractor shall provide its testing statistical data to the Company.

Listed below are sources of help and information:

National Clearinghouse for Alcohol and Drug Information
Monday through Friday
1-800-729-6686

The National Federation of Parents for Drug- Free Youth
Monday through Friday
1-800-554-KIDS

National Council on Alcoholism
7 days a week, 24 hours a day
1-800-662-2255

Cocaine Helpline
Monday through Friday
Saturday and Sunday, 12:00 p.m.-3:00 a.m.
1-800-662-HELP

For information on where to find treatment for alcohol and other drug problems, the best place to look is online under "Alcoholism Information" or "Drug Abuse and Addiction Information." Usually, there is a listing of the nearest Council on Alcoholism (or Council on Alcohol and Drug Abuse).

These Councils provide information over the phone on the availability of the nearest alcohol treatment programs. Alcoholics Anonymous (AA) or Narcotics Anonymous (NA) may also be listed. Both offer immeasurable help in enabling people to cope with problems with alcohol and other drugs. Information can also be found on the web at: www.drughelp.org.

Drug and Alcohol Testing and Property/Site Searches

Drug and Alcohol Testing and Property/Site Searches are to ensure a safe and drug-free workplace, to protect Company assets and to investigate drugs, alcohol and improper use of or access to Company property or assets by conducting random drug and alcohol testing or drug and alcohol testing based on reasonable suspicion in tandem with comprehensive security searches/screening of vehicles and on-site housing/trailers/offices and related workspaces on company-operated oil and gas sites, corporate offices and associated company owned housing while minimizing disruption to the continuity of ongoing business operations.

This applies to:

- All LEG company Team Members;
- All LEG third-party contractors and subcontractors;
- Any individual present on property owned or operated by Company, including but not limited to E&P sites;
- All LEG company property and assets whether owned or leased.

Testing may include:

- Urine drug screening
- Breath alcohol testing
- Testing is conducted in a manner that minimizes operational disruption, potentially by rotating through crews or work groups.
- Refusal to test or leaving the secure area/site is treated as a positive result and may result in disciplinary action, up to and including termination, or removal from site.

All Team Members acknowledge that by using Company owned property or entering Company owned property, each Team Member acknowledges the following: Company has the right to inspect, monitor and record the use of all Company property, Company provided communications devices, vehicles, systems, and facilities, with or without notice, and to search or monitor at any time all Company owned or leased property and any other personal property (including vehicles) on Company owned or leased premises.

Searches may include:

- Visual inspection or inspection by hand
- Use of trained contracted K9 units
- Any contraband or illegal substances found will be documented and reported to management and, if necessary, law enforcement.

Pipeline Policy

The possession, use, sale, attempted sale, manufacture, purchase, or transfer of illegal paraphernalia, drugs, mind altering chemicals, or alcoholic beverages are forbidden on any worksite, in any vehicle, on any vessel, in any parking lot, or other facility utilized strictly for business purposes by the Employer or its team members.

Team members and other as defined, will not work, operate any Employer equipment or vehicle, or enter into or onto any property, premise, or facility if they are under the influence of or are in possession of any illegal or controlled substance, un-prescribed drugs, or alcohol.

Violation of this policy will be grounds for disciplinary action up to and including termination of employment, as well as, refusal to submit to a drug and/or alcohol test or refusal to cooperate in reasonable searches as described. Note: Adulterated or substituted specimens will be considered refusals to submit to testing.

Please refer to the Pipeline DOT PHMSA Drug and Alcohol Policy in the policy library in the team member portal.

HARASSMENT-FREE WORK PLACE POLICY

Harassment in the workplace is unlawful and unacceptable conduct that will not be tolerated by the Company. Accordingly, the Company provides continuous training for team members and management on our zero-tolerance approach toward all types of harassment.

Definition of Harassment

Harassment is verbal or physical conduct that denigrates or shows hostility and/or aversion toward a team member because of that team member's race, color, religion, gender, national origin, age, or disability. Harassment can also occur if this type of conduct is directed toward a team member's relatives, friends, or associates.

Some Effects of Harassment

- Creates an intimidating, hostile, or offensive work environment;
- Unreasonably interferes with a team member's work performance;
- Otherwise adversely affects an individual's employment opportunities.

Types of Harassing Conduct (examples, but not limited to...)

Epithets, jokes, pranks, slurs, negative stereotyping, threats, intimidation, or hostility that relate to race, color, religion, gender, sexual orientation, national origin, age, or disability. This also includes written or graphic material that is circulated or displayed on walls, bulletin boards, or any other location within the workplace that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, national origin, age, or disability.

Sexual Harassment

Sexual harassment is explicitly prohibited. It is unlawful, against Company policy and will not be tolerated. The Company prohibits any form of sexually oriented speech or conduct that is unwelcome and offensive to the recipient. Conduct prohibited by this policy includes, but is not limited to:

- Sexually oriented verbal abuse;
- Jokes containing sexually oriented content that may cause embarrassment, offense or discomfort to the recipient;
- Sexually oriented nonverbal communication which may include looks or gestures;
- Unwelcome physical contact;
- Unwanted invitations, innuendo or pressure which may or may not include sexual suggestions.

Further, a supervisor who expressly or covertly bases job-related decisions on a team member's submission to sexually harassing conduct, or threatens to do so, violates the law and this policy.

Hostile work environment harassment occurs when harassment makes the workplace intolerable because constant sexual or gender-based activities or comments interferes with a team member's ability to do his or her job. Team members and/or supervisors can commit this type of harassment, as no position of authority is required to create a hostile work environment.

Complaint Procedures

The Company takes a proactive role in protecting team members from any type of harassment. Should harassment occur, it is the team member's responsibility to bring concerns to the attention of management. This includes team members who are the recipients of harassment as well as those who believe they have witnessed another team member being harassed. Team members should not assume management knows that harassment may be taking place.

All team members, at all levels, are responsible for maintaining a work environment free of harassment. Thus, non-supervisory team members will also be held accountable for harassing conduct.

Team members who have complaints should report such conduct to their supervisor, Department Manager, Human Resources Department, the COO, CFO, a VP, President or the CEO of the Company. Allegations of harassment will be promptly investigated, giving due regard to the need for confidentiality.

When a supervisor is notified of alleged harassment, the supervisor is required to promptly notify management. If a supervisor fails to take immediate action as a result of this notification, he or she may be subject to disciplinary action.

Protection Against Retaliation

Retaliation in any way against complainants/whistleblowers, witnesses, or persons who participate in the investigation of harassment is prohibited. A team member who makes a good-faith complaint of any type of harassment will be protected against retaliation or reprisals of any kind.

KICK BACK AND GIFTS POLICY

The Company strictly forbids all team members and contractors from providing or receiving any “kick-backs” to/from vendors, customers, landowners, suppliers, contractors, competitors, business partners or from anybody seeking any beneficial interest (collectively hereinafter referred to as “vendors”) with the Company. A “kick-back” is any money, service, good, or anything else of value provided by or to you in return for referral of work, business, or services to or from the Company. “Kick-backs” also include payments received from an intermediary or person acting on behalf of a vendor. By acknowledging this policy manual, you have understood and agreed that you may not under any circumstances accept from any vendor, supplier, competitor, customer, or client, any gift, item or service without prior written authorization. This prohibition on gifts does not apply to promotional, marketing/ advertising materials or any activity in which five (5) or more Company Team Members are invited to attend (breakfast for the department, training, seminar, etc.).

The Company enforces the Anti-Kick Back and Gifts policy earnestly. Any team member found to be in violation of this policy will be subject to disciplinary action, which may include immediate termination of employment. Further, the Company and its affiliates encourage its team members to report any suspicious activity that may violate this policy. There is a confidential and discrete way to report any violations or suspicions to the Human Resources Department by calling the Fraud, Waste, and Abuse Hotline at 855-900-0047.

Company team members attending other vendor's corporate entertainment events is acceptable when there is demonstrable business value and payment for travel costs is minimal. The actual level of gift or entertainment offered should be judged to be appropriate for the recipient in the industry. It should not be set so high such that a new precedent is established, nor should it be so low as to cause insult. The cost and style of corporate entertainment, whether given or received, should be at a level that would be perceived to be normal in the oil and gas industry.

Any gifts or entertainment should have demonstrable benefit to the Company's business and the gift cannot be interpreted as creating an obligation on the recipient.

Gifts Executives Must Approve

It may be insulting to turn down a gift that is in excess of the above stipulations. In these circumstances you should accept the gift on behalf of the Company and report it to your supervisor and an executive. For purposes of this policy, an “executive” is defined as one of the following individuals: COO, President, or Rod Lewis – Founder and CEO. They will decide if (a) you may retain the gift, (b) if it will be retained for the benefit of the Company, (c) the gift will be sold (to you or others) and the money donated to a charity, and/or (d) the gift is to be returned to the donor. Gifts of cash are bribes and are not to be accepted under any circumstances.

All significant gifts and entertainment given, accepted or declined must be recorded, reported to, and pre-approved by two executives via email. This does not include nominal value items such as promotional material or working meals. You should contact the most senior manager of your department if you need advice or if you are in any doubt about the acceptability of any entertainment or gift you are offered or wish to offer.

In summary, team members may not under any circumstances accept from any vendor, supplier, competitor, customer, or client, any gift or other item or service without the prior written authorization from a company Executive. This prohibition on gifts does not apply to any activity in which five (5) or more Company Team Members are invited to attend.

Gifts That Should Never Be Accepted

- Never accept or offer gifts of cash or cash equivalents, such as bank checks, money order, investment securities, gift certificates, loans, stock, or stock options.
- Never accept a gift which is “quid pro quo” offered for something in return.
- Never accept a gift that could be viewed as lavish.
- Never seek a gift/entertainment from any organization that does business with the Company or would like to do business with the Company.
- Never accept gifts/entertainment as a private individual or by family and friends on behalf of the team member, rather than following approved guidelines.
- Never accept gifts/entertainment, including organized corporate entertainment, in the course of a tender or negotiation for supplies of goods and services. This includes areas such as contract amendments, claims and final contract values.
- Never accept invitations to attend corporate events that involve significant travel and/or overnight accommodations being paid for by the host company.
- Never accept prizes from a raffle or a business event without prior authorization.
- Never accept discounts, loans, or favorable terms on a product or service, transportation, use of vacation facilities, home improvements, or prizes that only benefit you personally.
- Do not accept a donation to a charity.
- Never offer a gift where you know it violates the recipient's policy.

Reporting a Violation

It is important that every team member understands the rules and reports any wrongdoing he or she notices as soon as possible. If you believe a violation is occurring or has occurred, you should report it immediately to Human Resources. Reports may be made anonymously in writing. Any team member who, in good faith, lawfully and truthfully seeks advice, raises a concern or reports misconduct is doing the right thing and abiding by this policy. No matter how you choose to report, as long as your report is made honestly and in good faith, the Company will take no retaliatory action against you for making the report. Allegations of retaliation will be investigated.

Full compliance requires the participation and cooperation of every team member at every level. All team members, officers and agents are expected and required to comply with this policy.

It is the Company's intent to fully enforce the Anti "Kick-Back" and Gift Policy. Any team member who violates this policy will be subject to discipline, up to and including termination of employment. Any contractor of the Company who violates this policy may be prohibited from performing services or work for the Company in the future and may also be subject to legal action by the Company.

In addition, current team members, former team members, and contractors who have information that this policy has been violated have an obligation to report this information to Human Resources or the CEO, either in writing, by email, or over the phone. Mailing information is as follows:

Lewis Resource Management, LLC
10101 Reunion Place, Suite 1000
San Antonio, Texas 78216
210-384-3200

Third parties with knowledge of a violation of the Policy are also encouraged to make a report in any of the manners described above. All reports shall be investigated and the Company shall not retaliate against anyone who, in good faith, provides information regarding suspected violations.

In the event the Company's investigation reveals that a team member or contractor has in fact violated the policy, the person making the report may be eligible for a reward at Company's discretion, provided that the person has identified himself/herself and the information provided leads to the determination that a violation has occurred.

COMPANY OWNED DEVICES POLICY

LRM has a significant investment in equipment that requires vigilance. Guidelines have been developed pertaining to the use of these resources. It is the purpose of this policy to document and formalize a way that supports legitimate business use while protecting business interests.

Team members are expected to take reasonable precautions to protect their company-issued devices and limit their use to company-related business. Accidents can occur as a normal consequence of harsh environments, but this does not excuse neglect or thoughtless acts that result in damage to these devices.

Therefore, it is the policy:

- To hold team members responsible for the cost of repair or replacement of devices that are damaged as a result of negligence or where there is a pattern of abuse, neglect, or carelessness.
- To require team members to report accidents immediately to their supervisor. Team members are to use company-issued devices exclusively for company business.
- Under no circumstances are team members allowed to charge personal services or products to the company.

This policy also serves as notification that in accordance with the Federal Electronic Communications Privacy Act, these company issued devices may be monitored for all lawful purposes: ensure authorized use, quality control, system management, protect against unauthorized access, and verify security procedures. During monitoring, information may be examined, recorded, copied, and used for authorized purposes. All information, including personal information placed on or sent over the Company's system, may be monitored. Use of this system constitutes consent to monitoring for all lawful purposes.

Unauthorized use of these devices or non-covered damages that result in costs to the Company will be charged to the team member. Repeated violations may result in disciplinary action.

Mobile Phones While Driving

The use of mobile phones and other hand-held electronic devices interferes with safe performance of driving tasks. Team members may not use cell phones or other hand-held electronic devices for any reason while operating any type of motor vehicle or any other machinery for work. This includes team members who are frequent travelers and those who may drive incidentally. In emergency situations, team members should pull off the road in a safe/legal area to make or receive calls on a mobile phone. Hands-free devices are allowed.

A team member who receives a traffic citation or is involved in an incident related to mobile phone or other hand-held electronic device use while operating a motor vehicle on the job, must report it to his/her supervisor immediately. A team member who is convicted of a traffic violation resulting from using a mobile phone or other hand-held electronic device while operating a motor vehicle or any other machinery owned by the Company must report the conviction to his/her supervisor immediately and will be responsible for all penalties that result from such action. Team members should understand that failure to comply with this policy could result in disciplinary action up to and including termination.

UNAUTHORIZED RECORDING POLICY

"Recordings" means the use of any device to capture images or voices, whether in person, by telephone or by other means, such as video conferencing, screen shots, click-to-chat or in writing.

The Company recognizes the need to protect its confidential, proprietary information from unauthorized disclosure, while also restricting recordings that violate HIPAA, constitute team member harassment, or discloses trade secrets, proprietary interest, or confidential information.

The company complies with the Texas wiretapping law, which makes it a crime to intercept or record any "wire, oral, or electronic communication" unless one party to the conversation consents. Texas Penal Code § 16.02.

No team member may record the conversation of another team member without his or her full knowledge and consent. Recordings during work time, while in work areas, or while conducting the employer's business is not allowed unless done for purposes of protected, concerted activity. This policy is not intended to infringe upon a team member's rights under Section 7 of the NLRA if employee is acting in concert for their mutual aid and protection as long as no overriding employer interest is present.

SURFACE OPERATIONS POLICY

Our working relationship with the surface owners and surface tenants of the lands on which we operate is of utmost importance to the Company. Our reputation as an operator affects our ability to continue to lease good prospects to operate. Without good lands to drill, our company cannot succeed. The following guidelines apply to all team members, contractors, and any third parties accessing properties on our behalf:

- Keep all properties free of litter and trash. Do not leave papers, boxes, sacks, containers or waste material of any kind. Should you come across litter or trash, pick it up immediately and properly dispose of it.
- Do not bring any pets, firearms, weapons, hunting paraphernalia, fishing tackle, alcoholic beverages, illegal drugs or substances upon the property. Do not hunt, fish, swim, camp, or picnic.
- Do not remove any artifacts, cacti, shrubs, rocks, or other natural features from the land.
- Close all exterior and interior gates as you found them unless otherwise directed by the landowner.
- Promptly repair any gate, fence, or other improvement that may suffer damage or injury by reason of Lessee's operations.
- Show due respect for the Lessor's or any of surface tenant's operations on the surface of the land, including any crops, livestock, wildlife, dwellings, fresh water wells, and all other surface improvements.
- Do not cut or go over any fence or fences on the property unless necessary and then only after consulting with the surface owner or tenant.

- Take all measures to prevent any waste oil or salt water from flowing over the surface of the property and from draining into any draws, drains, creeks, or ravines.
- Consult with the surface owner or tenant regarding the use of gates and roadways for entering and leaving the property, and when possible, use the routes, roadways, and approaches on the property designated by the surface owner or tenant.
- Maintain all ranch roads used in operations, on the property, in good condition. Report any roads in need of repair.
- No speeding or reckless driving on the properties.
- Properly remediate the surface within a reasonable time after cessation of any drilling, reworking, or production operation.
- Carry personal identification while on the property.

The Company strictly enforces this policy. Team members violating this policy will be subject to disciplinary action, up to and including termination of employment.

Company Business and Travel Expense Policy

Policy Overview

Lewis Energy Group recognizes that expenses and travel can be an essential element for team members to complete job responsibilities. All business travel should be conducted responsibly, ethically, and economically. The business travel expense policies, procedures, and responsibilities outlined in the following pages are designed to provide an efficient and cost effective process to attain these goals.

General

The Lewis Energy Group CEO and President are the only executives who may authorize individual exceptions to this policy. Their authorizations may not be delegated to other team members.

All team member business expenses and reservations are to be made through Expense Point, unless authorized by Senior Leadership.

Support of our preferred supplier programs is required so that we maximize savings opportunities.

Scope and Responsibilities

It is the responsibility of individual managers and team members to ensure these guidelines are followed.

Managers are responsible for:

- Ensuring that the policies and procedures outlined in this document are understood, communicated and followed by team members.
- Determining that each trip and expense is essential and that the benefits of the trip cannot be achieved through other cost savings means (e.g. telephone calls, video/web conferencing, incoming supplier visits, etc.);
- Limiting the number of personnel traveling on a given trip to those necessary to achieve the expected business results; and
- Reviewing expenses and/or vendor selections to ensure compliance with the policy and preferred vendor relationships.

Team members are responsible for:

- Complying with the policies and procedures outlined in this document and approved addendums;
- Controlling the cost of expenses and travel;
- Using Expense Point to submit expenses, research and book flights and hotels;
- Ensuring submission of accurate and timely expense reports; and
- Identifying and paying for personal expenses.

Company personnel should not disclose information regarding preferred travel supplier agreements with Lewis Energy Group to anyone outside the Company.

Violation of any section in this policy, may result in partial or non-reimbursement, and disciplinary action up to and including dismissal.

Interpretation and Enforcement

Human Resources and Accounts Payable will be responsible for systems and procedures to ensure compliance with the policy and in addition, will reconcile and settle uncertainties or disagreements.

Team members will be reimbursed for all reasonable and necessary business and travel expenses incurred while on Company business provided that expenses are completed in accordance with the policy and appropriate expense reimbursement requirements are met.

Failure to submit your request through the Expense Point, failure to use preferred vendors, or travel by more expensive means than authorized by this policy could result in partial or non-reimbursement for expenses and be subject to disciplinary action.

Travel Arrangements

Traveling From Your Primary Work Location to Another Work Location

Team members who travel between offices must adhere to the following:

- If an overnight stay is required, and approved by management, then arrangements must be made by the team member to either stay in the Lewis provided housing (when in Encinal) or through Expense Point for local hotels in the San Antonio or Laredo area. Any other arrangements paid for by a team member will not be reimbursable.
- Mileage is only reimbursable from a team member's primary work location to another office (San Antonio to Encinal or vice versa). All personal items that are needed for a trip are at the expense of the employee. Expense reports that are submitted for reimbursement that contain any other items will not be reimbursed.

Note: Mileage can only be reimbursed from a team member's home when traveling to a temporary work location such as a conference, client visit or field location.

Travel Reservations

All air, lodging, car rental, and ground transportation reservations are to be coordinated through Expense Point. For special needs please contact Human Resources or Accounts Payable.

Travel Approval

Supervisors must take an active role in determining the necessity for each trip. All trips must have manager approval, approval will be obtained prior to request submission. Approval for travel outside of the US, will only be granted after executive approval is received.

Travel Prohibitions

Team members must NOT travel to countries for which a travel prohibition has been issued by Lewis Energy Group without pre-approval of the President or CEO.

Personal travel needs are the responsibility of the team member and Lewis will not book any travel request of a personal nature. This includes extended stays during a conference or travel arrangement for spouses or family.

Non-Lewis Energy Group Travelers

Non-Lewis Energy Group travelers, i.e. contractors, applicants, etc. who travel on behalf of Lewis Energy Group are expected to abide by the policy guidelines set forth in this document and are encouraged to use our managed program (to take advantage of the negotiated discounts). However, these travelers must have their travel arranged via Expense Point.

Air, Car & Hotel Frequent Traveler Award Programs

Team members may use personal upgrades, through frequent flier miles or other programs, to improve class of service (i.e. airline, room, and car rental size upgrades), provided there is no additional cost for the Company.

- Upgrades if expensed will not be reimbursed and team members may be subject to disciplinary action for repeat offenses.
- Airline seat upgrades are not reimbursable and will be at the expense of the traveler. Seat upgrades will not be booked and must be arranged by the traveler. In the extent of a medical necessity, approval for such upgrades will need to have prior approval by HR.

Airline Class of Service

- Coach/Economy class is the Lewis Energy Group standard class of service.
- 14-21 days advance purchase is encouraged.

Passport/Visa/Immunizations

Business travelers are responsible for obtaining the necessary passport, visas, and immunizations when traveling outside of the US. Costs for passport or visa expenses are only reimbursable if the specific employee job/role requires a passport. For a list of all passport requirements please visit the US Department of State link:

<https://travel.state.gov/content/travel/en/passports.html/>

General Passport Guidelines to follow:

- Be aware of passport processing times, new passports can take up to 8 weeks without the use of an expedited service.
- A new passport is required if your name has changed and you have no supporting documents.
- Passports that will expire within 6 months of the dates of travel should be renewed.

Trips Changes and Cancellations

Changes to any trip or itinerary need to be submitted through Expense Point and will only be authorized if any additional costs are limited.

If you are cancelling a ticket or reservation that was booked you should do so via Expense Point prior to departure of the cancelled flight.

Overnight Delays

If an airline delay creates an unexpected overnight stay, the team member should attempt to secure complimentary lodging from the airline.

Lost Baggage

Responsibility for retrieving and compensating for lost baggage lies ultimately with the airlines. The team member's charge card may provide limited baggage insurance, but the traveler should make initial claims via the airline.

Hotel/Lodging

Hotel and Lodging bookings for team members should be made via Expense Point except for conference bookings.

Travelers are required to stay in moderately priced hotels offering clean and comfortable rooms. Standard single rooms are approved for use by travelers.

Hotel rewards may be retained for personal use; however, participation in these programs must not influence the hotel selection. Membership fees associated with joining these programs are not reimbursable.

Conferences/Conventions

Due to special rates negotiated by convention sponsors, hotel bookings for trade shows/conferences/conventions should not be made directly with the hotel but instead with conference preferred hotel for optimal savings. Please let Human Resources and Accounts Payable know prior to booking.

All conference bookings should be made with as minimal bookings as possible at a time. If you are attending a conference or convention as a group, please have your entire group info ready when requesting to book for a conference. Conferences should be booked as soon as possible to secure the best possible rates and rooms.

Conference registration fees should be scheduled and paid for through the Lewis Energy Group corporate card.

When scheduling a conference please include: List of attendees, hotel preference, weblink to the conference, alternate hotel choices.

Car Rental

Car Rental bookings for team members must be made through Expense Point.

Lewis Energy Group has negotiated preferred supplier programs to meet the Company's car rental requirements. Travelers must be 21 years of age or older to rent a car.

Class of Service

A Mid-size car is the standard for all Lewis Energy Group travelers. A full-size car is permitted when three (3) or more travelers are riding together.

Other Transportation

Team members are encouraged to utilize the most economical and safest mode of transportation. Team members should consider the use of local transportation such as hotel shuttles, taxis, Uber/Lift or public transportation between airports, home, and the departure point, or between the arrival point and place of meeting or lodging. Individual expenditures of this nature must be properly identified on the expense report.

Meal Expenses

- Encinal to San Antonio or San Antonio to Encinal, Meals will not be reimbursed for single day travel. Dinner will be reimbursed if you are asked by your manager, or if the job/role requires overnight travel away from your normal weekly place of work and is reasonable and within the allotted daily per-diem amount.
- Meal expenses directly related to overnight travel, outside of Encinal and San Antonio travel, will be reimbursed if reasonable and within the allotted daily per-diem amount. Travelers are expected to dine at reasonably priced establishments and team members are expected to exercise reasonable judgment in the selection process.
- Team members, with a Lewis Energy Group Corporate card, are responsible for group meals if travelling in a group. If no team member has a Corporate T&E card within a group, then individual travelers are responsible for submitting their own expense reports for meals.

Alcohol will NOT be reimbursed on any expense report.

Meals are not to exceed the daily limit of \$60.00 per employee. Meals will have the following recommended daily limits: Breakfast \$15.00, Lunch \$20.00 and Dinner \$25.00

Business Meals and Entertainment

Business trips may necessitate hosting business contacts outside of Company offices. Such meals or entertainment may not be lavish and must be cleared first with an Executive if necessary to conduct business.

Expense Reporting Guidelines

Receipts & Expenses Point Reporting System

Any team member who is seeking to be reimbursed for company related expenses will need to be set up to use the Expense Point reporting system. All reimbursable expenses must be submitted in a timely manner through this system, any expenses that are submitted outside of Expense Point will not be authorized. Original receipts are required for all reimbursable expenses. These receipts should be uploaded to Expense Point. Handwritten receipts generally are not considered an acceptable receipt. All reimbursement requests for business conference/entertainment expenses must be supported by a receipt regardless of amount. Receipts should be itemized when they can and the associated expense report should be itemized on all submissions.

Out-of-Pocket Expenses

When incurring any business-related, out-of-pocket personal expense which requires Company reimbursement, team members are expected to complete an expense report within Expense Point as soon as possible.

Approved out of pocket expense reimbursement amounts will be included as part of the team member's bi-weekly payroll check. The check amount will include all approved business expense reports processed at that time.

Responsibility

Team members are responsible for accurate and timely submission of all company-related expense reports within Expense Point. Reimbursement expenses must be submitted and approved no later than the end of the day on Friday before a payroll week.

Department managers are responsible for reviewing the report for accuracy and for adherence with this policy. The President or COO of the Company must approve any exception or standing departure from this policy.

Enforcement

In instances of personal, out-of-pocket company expenses, team members who do not comply with this policy may be subject to delays in reimbursement, possible withholding in part (or all) reimbursement dollars, or the administration of disciplinary actions.

Where a Company authorized credit card is used, team members who do not comply with the expense reporting aspect of this policy may have their card suspended/revoked and be subject to disciplinary actions. Team members may be required to also repay the company via payroll deduction for any personal or rejected charges on the company card.

Company Authorized Credit Card

Team members who have been issued a company credit card must use the card for business purposes only. Out of pocket expenses for those team members who hold a company card will not be permitted without an approved exception from the CEO or President.

Use of the Company authorized credit card will require an expense report within Expense Point for all purchase transactions. Company credit card expense reports are due on or before the 5th day of each month.

AI USAGE POLICY

Purpose

The purpose of this policy is to establish guidelines for the use of artificial intelligence (AI) technologies in order to ensure secure utilization of AI tools and systems while upholding the company's values, protecting sensitive data, and complying with relevant regulations.

Scope

This policy applies to all team members, managers, supervisors, contractors, and third parties who have access to and use of all third party and/or publicly available AI tools, systems, or data within the organization.

Guidelines

- *Authorized Use:* Team members may use AI technologies and tools only with prior approval from the Executive Committee. When approved for use by the Executive Committee, team members may use AI technologies only for authorized business purposes and in accordance with their job responsibilities. The use of publicly available AI models, including pre-trained models and algorithms sourced from the internet or other external sources, is strictly prohibited unless explicitly authorized by the Executive Committee.
- *Data Privacy and Confidentiality:* When approved to use AI technologies, team members must respect the privacy and confidentiality of data processed by AI systems. Personal and proprietary information should be handled with care, and access to such data should be limited to authorized personnel only. Personal and proprietary information shall not be disclosed, uploaded or input into any AI technologies or systems.
- *Compliance with Policies and Regulations:* Employees must comply with all applicable company policies, procedures, and regulatory requirements related to the use of AI technologies, including but not limited to data security, privacy, intellectual property, and anti-discrimination laws. Team members must also comply with all licensing agreements, copyright laws and terms of service of third-party AI technologies or systems.
- *Security Awareness:* Team members should be vigilant about potential security threats associated with AI technologies, such as data breaches, cyberattacks, and malicious manipulation of AI models. Any suspicious activity should be reported promptly to employee's Manager or Supervisor and AI Administrators.

Responsibilities

- *Managers and Supervisors:* Managers and supervisors are responsible for ensuring that team members under their supervision understand and comply with this policy. Managers and Supervisors should provide guidance, support, and training to employees as needed.
- *AI Administrators:* All use of AI technologies and systems is subject to monitoring by the Company. The IT Department is responsible for overseeing the deployment, configuration, and maintenance of AI systems within the organization.

- *Team members:* Team members are responsible for adhering to this policy, using AI technologies responsibly, and reporting any violations or security incidents to their Managers, Supervisors and the IT Department.

Enforcement

Violations of this policy may result in disciplinary action, up to and including termination of employment or legal consequences, depending on the severity of the violation and applicable laws and regulations.

Acknowledgement

By continuing to work for the Company and by using AI technologies within the Company, you acknowledge that you have read, understood, and agree to comply with this AI usage policy.

SECTION 10: Team Member Handbook and Information Acknowledgment

This Team Member Handbook contains important information about your employment with the Company. Policies contained in this Handbook include, but are not limited to:

1. The Employee Authorization for Payroll Deduction
2. Accident and Incident Reporting
3. E-mail and Internet Use
4. DOT Drug and Alcohol Policy
5. Drug and Alcohol Policy
6. Harassment Free Workplace Policy
7. Kick Backs and Gifts Policy
8. Mobile Phone and Hand-Held Electronic Devices While Driving
9. Surface Operations Policy
10. Company Business Travel Policy
11. AI Usage Policy

I acknowledge that it is my responsibility to:

- Read, understand, and comply with all the policies contained in the Team Member Handbook and any revisions made to it. Additionally, review of the DOT Drug and Alcohol Policy and PHMSA Drug and Alcohol Policy is my responsibility as a DOT Team Member (only if applicable).
- Ask my supervisor or the Human Resources Department about any questions not answered in the Team Member Handbook.
- I understand that the Handbook is neither a contract of employment nor a legal document. I have entered into my employment relationship voluntarily and acknowledge that there is no specified length of employment. Accordingly, either I or the Company can terminate the relationship at will, at any time, with or without cause and with or without notice.
- These policies are subject to change and I acknowledge that revisions may occur at any time, with or without notice. All pertinent changes will be communicated, and I understand that revised information may supersede, modify, or eliminate existing policies and benefit programs.
- I also understand and agree to the terms of the Confidentiality and Non-Compete Policy and the Arbitration Agreement.

Please contact Human Resources with any questions you might have regarding the Team Member Handbook.

CONTACT US

210-384-3200
Human Resources



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